

included in the Daily Usage File (“DUF”) and meet point billing file, Qwest benefits because its CLEC competitors have less cash with which to compete and defend themselves against Qwest. In the future, if granted 27.1 authority, Qwest will also benefit because, as an interexchange carrier, it will pay less than should be due for access.

Because of the significance of this issue, Eschelon has expended substantial resources on outside audits to examine the problem, in addition to the internal resources devoted to it. In 2001, Eschelon paid more than one half of a million dollars for an outside consultant to perform audits relating to this issue. A start-up CLEC does not spend this kind of money on an issue unless it has ample reason to believe that much more is at stake. And, as discussed below, Eschelon has spent another substantial sum in 2002 to perform another audit.

With respect to missing switched access minutes, Eschelon’s position that MOU were missing was supported not only by audits but also by external and internal datapoints and Qwest’s own admissions. Eschelon provided Qwest-data showing that the MOU provided by Qwest to Eschelon for UNE-P are substantially lower than the MOU received by Qwest, other RBOCs, and Eschelon for On-Net lines. These datapoints showed that the number of records being provided by Qwest was deficient by comparison to any of these standards. Also, in 2001, Qwest admitted that the MOU that it provided to Eschelon did not include intraLATA toll traffic carried by Qwest. On that basis alone, the MOU were understated. Although Qwest has claimed more recently that it is now providing its own Qwest-carried intraLATA toll records, the records are far below what would be expected. Qwest has indicated to Eschelon that it has a 43% market share in its territory for such calls. This suggests the records continue to be inaccurate.

The auditor retained by Eschelon in 2001 made a number of calls that were *not found in the access records Qwest provided to Eschelon*. Qwest did not locate those calls. The audit and Qwest's failure to locate the records showed, therefore, that Eschelon's position that needed records were missing was correct. This audit was part of a Joint Audit process agreed to by Qwest.⁶⁸

As its part in the joint audit, Qwest also retained an auditor (Arthur Andersen) in 2001 to conduct an audit on this issue. Although Qwest claimed that its auditor could locate certain calls *in its switch*, that response missed the mark. The calls must be provided in the access records *given to the CLEC* before the CLEC may bill for them. Although Qwest had agreed to allow the auditors to work together until their results came within 5 percent of each other, Qwest unilaterally terminated the work of its auditor before the audit concluded. Later, Qwest paid Eschelon monies as part of a public settlement agreement that included switched access disputed amounts through February 28, 2002.

After February 28, 2002, Eschelon remained concerned about the usage it was receiving from Qwest; In March 2002, the trend of missing records continued. In April, 2002, not long before Qwest filed its first 271 application with the FCC, the number of

⁶⁸ Even though Eschelon does not have the burden of showing that Qwest's DUF is missing records, Eschelon has provided not only external datapoints (such as data relating to Eschelon's On-Net minutes, etc.) to Qwest but also provided this expensive audit report to Qwest at the time as part of a joint audit. Eschelon has gone over and above any legal obligation to obtain and provide data to Qwest. Nonetheless, Qwest recently represented to the state commissions participating in the Regional Oversight Committee ("ROC") that Eschelon has a "historical failure to provide substantive evidence supporting its claims" relating to switched access. (Letter by R. Steven Davis of Qwest to ROC participants (Sept. 30, 2002), p. 4.) Individuals may decide for themselves the fairness and accuracy of Qwest making this representation without so much as mentioning an extensive joint audit fully accessible to Qwest, datapoints provided to Qwest, and Qwest's own admissions relating to intra-LATA traffic. The 2002 audit is over and above the 2001 audit well known to Qwest that had already established a significant problem with the switched access records provided by Qwest.

records increased dramatically, to a number closer to that long asserted by Eschelon as the correct number. Eschelon's usage patterns had not changed. This increase in the number of records, therefore, validated Eschelon's position that the number had been too low. The number was still not quite as high as Eschelon thought it should be, though, and Eschelon still has concerns about the issue of Qwest-carried intraLATA toll traffic (the records Qwest had admitted were missing).

Eschelon embarked on another access audit. The test calls began in April and ended the last week of May, 2002, in each of Qwest's operating regions. The test calls were originated or terminated from Eschelon's Off-Net lines and some test calls were terminated to Eschelon's On-Net customers. For each test call, Qwest should have generated an access record to Eschelon so Eschelon could bill the interexchange carrier. Searching the DUF and meet point billing files for these test calls has shown that calls are still missing from the DUF.

The final report is enclosed as Exhibit 39. The third party conducting the study provided the following brief synopsis of its conclusions:

- a. "In general, it is our conclusion that approximately 22% of the calls made for which Qwest was responsible for providing access records still remain unaccounted for at this time. By unaccounted for, we mean that we can't find a suitable match between the test call made by one of the testers and an EMR record submitted by Qwest to Eschelon for billing.
- b. We undertook a detailed review of the process by which Eschelon requests, receives and processes records of these types for billing, and based on this review, we believe it unlikely that an error in the Eschelon processing would account for the missing records. Based on our analysis, we can find no evidence that these calls were sent by Qwest to Eschelon for processing.
- c. Specifically, 15% of originating calls (calls that were originated from "test" numbers) were unmatched while 85% were matched.

- d. Thirty-three percent (33%) of terminating test calls (calls that were terminated to "test" numbers) were unmatched while 67% were matched.
- e. The over all percentage of matched minutes (84%) was consistently higher than the percentage of matched calls (78%). (See table below) This is consistent with the finding that, on average, we were able to find longer duration calls for matching, most notably on terminating calls.
- f. These results are consistent across locations, CLLI's, and Service Types, although:
 - 1. Centrex Plus Non-Matches are 25.3%, as opposed to 20.5% on other Service Types.
 - 2. Intra LATA calls were un-matched at 36.0%, which was approximately twice the un-matched rate of Inter LATA Calls. No test calls were made from or terminated to lines that were pre-subscribed to Qwest IntraLATA toll.
 - 3. Matching varied greatly by Dialing Pattern, as the table below shows:

Dialing Pattern	Percent Of Calls		Percent Of Duration	
	Matched	Un-Matched	Matched	Un-Matched
800 Total	67.0%	33.0%	64.7%	35.3%
1+ Total	78.5%	21.5%	83.3%	16.7%
1010XXX Total	81.1%	18.9%	85.6%	14.4%
Calling Card Total	84.1%	15.9%	93.1%	6.9%
DA Total	36.6%	63.4%	27.3%	72.7%
Operator Total	72.2%	27.8%	84.1%	15.9%
Grand Total	77.9%	22.1%	84.3%	15.7%

See Exhibit 39, pp. 1-2.

As Eschelon has maintained for approximately two years, Qwest is shorting Eschelon minutes. Although the percentage missing at least temporarily improved from 2001, when the original audits were performed, a figure of 22% is a serious concern.⁶⁹

⁶⁹ In addition, the test call audit did not include intraLATA originating and terminating minutes that are carried by Qwest (IntraLATA toll calling that Qwest continues to provide). Some former Qwest customers

This also raises a question as to the basis for Qwest's claim per its performance measures that its DUF is up to 100% accurate, when an outside audit suggests that the percentage, at the height" of the records produced by Qwest, was closer to 78%.

Alan Zimmerman of Qwest has indicated that Qwest is reviewing the results of the 2002 audit. His initial comments to Eschelon suggest that, once again, Qwest is focusing on whether it can locate the call *in Qwest's switches*. Qwest needs to show that records of the calls are then provided to Eschelon *in the DUF or meetpoint billing files*. Until the records are provided to CLECs, CLECs may not bill interexchange carriers for the associated access. Eschelon will work with Qwest on yet another effort to verify that Qwest is providing inadequate records from which CLECs may bill for access. Ultimately, however, the burden on this issue belongs to Qwest.

As indicated, the most recent access study was conducted while Qwest was providing an increased number of records. The missing minutes reflected in the study are over and above the greater number of records produced by Qwest during that time period. Recently (after the test call period), the number of records provided by Qwest dropped sharply.

As a datapoint or benchmark, Eschelon's On-Net lines bill consistently at more than 400 MOUs each month. In April 2002, while not at this level, Eschelon's Off-Net MOUs did increase to 360 MOUs per line. The increase in number of MOUs continued

choose to maintain Qwest as their intraLATA toll provider when switching local carriers. Also, many current Qwest retail customers have Qwest as their intraLATA toll provider. When their calls terminate to an Eschelon customer, Qwest is required to provide a terminating access record to Eschelon to allow Eschelon to bill Qwest. In 2001, Qwest told Eschelon it does not provide these call records, and Eschelon still does not believe Qwest is providing all of the records for Qwest carried intraLATA toll access, as discussed above.

for several months, including the time period covered by the outside test call study, In August, the MOUs per line dropped to 308 and, in September 2002, the MOUs dropped again to *280 MOUs per fine*. This number, far below the 400 MOUs per line per month for On-Net lines, is an unrealistically low number. Alan Zimmerman of Qwest indicated to Eschelon in 2001 that Qwest itself bills 365 minutes per line per month (including Qwest's residential base).” Residential customers typically have lower minutes per line than business lines. (Eschelon serves business customers.)

Eschelon's usage patterns did not change during the relevant time, but the MOUs per line per month vary significantly.⁷² The revenue impact to Eschelon from *a drop of 50 MOUs per fineper month* (April v. September) is significant. Due to the very short time deadlines for this filing, there is insufficient time to determine whether the decline that started in August and is very apparent in September will continue. The FCC should not approve Qwest's application until Qwest demonstrates that this is not a trend and that Qwest is providing accurate records in the appropriate format to CLECs.

⁷⁰ As discussed below, the number of records received dropped sharply in September (the month in which the FCC would have issued a **271** Order with respect to Qwest Application I, if Qwest had not needed to withdraw its Application).

⁷¹ See also Qwest 3 Ex Parte Rate Reductions, 02-3 14, 1019102,p. 1, note 1 (Qwest assumed **370 originating and terminating intraLATA toil**, intrastate interLATA, and interstate interLATA minutes per line per month when converting the per-minute rates for local switching and shared transport to per-line equivalents).

⁷² Eschelon has asked Mr. Zimmerman and its Qwest service manager to explain any Qwest changes in April and then August/September that could explain the sudden increase and later decrease in number of MOUs per line per month. Qwest has not provided an explanation.

Eschelon Telecom, Inc.
02-314: CO, ID, IA, MT, NE, **ND**, UT, WA, WY
October 15, 2002

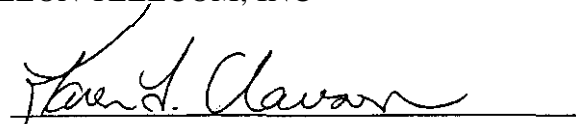
11. CONCLUSION

The FCC should deny Qwest's Application and encourage Qwest to resolve these problems before re-submitting its Application.

October 15, 2002

ESCHELON TELECOM, INC

By:



Karen L. Clauson

Eschelon Telecom, Inc.

730 2nd Avenue South, Suite 1200

Minneapolis, MN 55402-2456

(612) 436-6026

Exhibit 25
ESCHELON FILINGS IN QWEST FCC 271 PROCEEDINGS

EXHIBIT
NUMBER

July 3, 2002 Comments, 02-148

- 1 MN Discovery Responses
- 2 WA Discovery Responses
- 3 April 2002 Report Card Performance Summary
- 4 Affidavit of F. Lynne Powers (UNE-P, UNE-E, UNE-Star,
Billing, Provisioning, Documentation, Switched
Access, Reporting, Repair (DSL)), 6/7/02
- 5 Affidavit of Ellen Copley (resale bills for the UNE-E lines,
instead of accurate UNE-E bills)
- 6 Collocation Emails by Qwest and Eschelon

August 15, 2002 Ex Parte Comments. 02-148

- 7 Issues Eschelon Raised In September of 2000 In Arizona 271
That Remain Problems Today (July of 2002) [Customer Affecting
UNE-P Problems, majority of which result from service order
writing errors or errors in line side translations; Feature
Availability Issues, including Remote Access Forwarding; Time
Consuming and Cumbersome GUI 'Ordering; Inadequate Support
for Resolving Issues; Cutover Issues]
- 8 April 2002 Report Card Performance Summary (inadvertently included;
should be list of manually handled order types – *See* Exhibit 7
to 8/1/02 Comments, 02-189)
- 9' New Service Installation Quality Results Chart (12/01 – 5/02)
- 10 Volume I, Transcript, *In re. U S WEST Communications, Inc.'s*
Compliance with § 271 of the Telecommunications Act of 1996,
Arizona Corporation Commission Docket No. T-00000A-97-0238
(July 30, 2002) ["AZ 271 Tr."]
- 11 Volume II, AZ 271 Tr. (July 31, 2002)
- 12 Service Manager email (inadequate account team support)
- 13 CLEC-to-CLEC email (Release 10.0 change)
- 14 Qwest AZ Late Filed Exhibit ("Table 1 summarizes the Qwest
response to Eschelon's issue about flow through to Resale POTS
and UNE-P POTS from specific existing products.")
- 15 CMP non-compliance email examples (Release 10.0, unannounced
Qwest dispatches, Coppermax, LSR rejects, raw loop data)
- 16 Examples of issues with Qwest rates billed on the July 25th dated
invoices to Eschelon
- 17 Collocation and Interconnection Issues

- 18 Eschelon's June 24, 2002 Response to Qwest's June 18, 2002 Letter to
AZ Commissioner Marc Spitzer; AZ Docket Nos. RT-00000F-02-0271,
T-00000A-97-0238
- 19 July 10, 2002 Eschelon Letter to AZ Commissioners Marc Spitzer and
Jim Irvin; AZ Docket Nos. RT-00000F-02-0271, T-00000A-97-0238
- September 4, 2002 Ex Parte Comments (02-148 & 02-189)
- 20 Qwest email (WE-E = Resale, for ordering, provisioning, and billing
purposes)
- August 1, 2002 Comments. 02-189
- 1 New Service Installation Quality Results Chart (12/01 – 5/02)
(*see also* Ex. 9, 02-148)
- 2 Issues Eschelon Raised In September of 2000 In Arizona 271
That Remain Problems Today (July of 2002) [Customer Affecting
UNE-P Problems, majority of which result from service order
writing errors or errors in line side translations; Feature
Availability Issues, including Remote Access Forwarding; Time
Consuming and Cumbersome GUI Ordering; Inadequate Support
for Resolving Issues; Cutover Issues] (*see also* Ex. 7 in 02-148)
- 3 MN Discovery Responses (*see also* Ex. 1 in 02-148)
- 4 WA Discovery Responses (*see also* Ex. 2 in 02-148)
- 5 April 2002 Report Card Performance Summary (*see also* Ex. 3 in 02-148)
- 6a (21)*¹ **Report Card Performance Graph (1/01 – 4/02)**
- 6b (22)* **Report Card Results (1/01 – 4/02)**
- 7 (23)* **Manual Handling: Conversion Types With Remarks**
- 8 Affidavit of F. Lynne Powers (UNE-P, UNE-E, UNE-Star,
Billing, Provisioning, Documentation, Switched
Access, Reporting, Repair (DSL)), 6/7/02
(*see also* Ex. 4 in 02-148)
- 9 Service Manager email (inadequate account team support)
(*see also* Ex. 12 in 02-148)
- 10 CMP non-compliance email examples (Release 10.0, unannounced
Qwest dispatches, Coppermax, LSR rejects) (similar to Ex. 15 in 02-148)
- 11 Affidavit of Ellen Copley (resale bills for the UNE-E lines,
instead of accurate UNE-E bills) (*see also* Ex. 5 in 02-148).
- 12 (24)* **Summary of AZ UNE-P Invoice Inaccuracies**
- 13 Collocation Emails by Qwest and Eschelon (*see also* Ex. 6 in 02-148)
- 14 Collocation and Interconnection Issues (*see also* Ex. 17 in 02-148)

¹ An asterisk (*) indicates that a new exhibit number has been assigned for purposes of this filing to differentiate the exhibit from previous filings that used the same number to refer to another exhibit. Exhibits 1-24 are incorporated by reference. Exhibits 25 and above are enclosed as part of this filing (02-314, 10/15/02).

TABLE OF EXHIBITS FOR ESCHELON 02-314 10/15/02 FILING
October 15, 2002 Comments, 02-314 (attached, with exhibits)

25	Eschelon Filings in Qwest FCC 271 Proceedings (<i>i.e.</i> , this document)
26	Eschelon's 9/4/02 Ex Parte Comments, 02-148 and 02-189, with attached Qwest email on "WE-Star Implementation" (courtesy copy for ease of reference)
27	OP-5 definition: New Service Installation Quality
28	Qwest Off-Net Conversion Service Order Errors/PSOs (Cumulative)
29	Qwest Off-Net Conversion Service Order Errors/PSOs (8/26 – 9/7)** ²
30	Qwest Off-Net Conversion Service Order Errors/PSOs (9/12 – 9/18)**
31	Qwest Off-Net Conversion Service Order Errors/PSOs (9/19 – 9/27)**
32	Qwest Off-Net Conversion Service Order Errors/PSOs (9/28 – 10/4)**
33	September Qwest Error Escalation Examples: Do Not Appear to be Captured in OP-5**
34	Qwest 10/8/02 email ("Flowthrough is not creating perfect orders at this time as we are all well aware.")
35	DSL New Installation Repair Data (Sept. 2002)
36	Qwest Design Tickets Coded NTF For Which There Were Qwest Errors
37	Maintenance and Repair for Design Services: % Disputed of Total Maintenance/Repair Charges Billed**
38	Powers and Copley Affidavits (courtesy copy, <i>see</i> Exs. 4-5) [Exhibits that are referred to in these Affidavits are included in the paper copy. Not all such exhibits are available electronically, and the information in Ex. 9 to the Powers Affidavit contains confidential information.]**
39	Switched Access Final Report
40	Qwest email ("The call type for PSO request will be "Order Status".)
41	Eschelon email (scope of orders included in data)

² A double asterisk (**) indicates that paper copies of confidential back up information, primarily customer-identifying information (such as the PSOs themselves) has been provided to the FCC and Qwest (via Hogan and Hartson). *See* Document Nos. _____. Also, from the PSO/ticket and other information provided, Qwest can verify the data provided in the Exhibits through its own records.

September 4, 2002

Filed Electronically

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Qwest Communications International, Inc. Consolidated Application for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska and North Dakota* (Qwest I) Docket No. 02-148

In the Matter of Qwest Communications International, Inc. Consolidated Application for Authority to Provide In-Region, InterLATA Services in Montana, Utah, Washington, and Wyoming (Qwest II) Docket No. 02-189

Dear Ms. Dortch:

Eschelon Telecom, Inc. ("Eschelon") submits these written Ex Parte Comments regarding the applications of Qwest Communications International, Inc. ("Qwest") for authorization under Section 271 of the Communications Act. Eschelon addresses two important issues: (1) service affecting troubles not reported in Qwest data (which are not limited to service order errors); and (2) the affect of including lines provisioned as resale in PID data for UNE-P.

A. SERVICE AFFECTING TROUBLES NOT REPORTED IN QWEST DATA: SERVICE ORDER ERRORS, WHILE SIGNIFICANT, ARE ONLY PART OF THE PROBLEM.

Eschelon has described the problems faced by CLEC end-user customers as a result of service affecting errors not reflected in Qwest's data.¹ The damage to CLECs goes beyond each transaction in which an end-user's service is affected and harms the

¹ See, e.g., Ex Parte Comments of Eschelon Telecom, Inc. In Opposition to the Consolidated Application of Qwest Communications, *In the Matter of Qwest Communications International, Inc. Consolidated Application for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska and North Dakota* (Qwest I) FCC, Docket No. 02-148 (Aug. 15, 2002) (Eschelon's Ex Parte Comments). References to Exhibits refer to the Exhibits to Eschelon's comments and ex parte comments in Qwest I (all of which are incorporated by reference in Qwest II). Additional cites may be included to the Exhibits numbers from the July 30-31, 2002, Arizona 271 workshop as well.

CLEC's reputation and ability to compete. Eschelon's commercial experience is very different from the performance results reported by Qwest. Although Eschelon has not been involved in numerous discussions of the PID data that have occurred since November of 2000, Eschelon has attempted to identify reasons why actual commercial experience varies from Qwest's reported data. In response to Qwest's claims, Eschelon will attempt to clarify those reasons. To Eschelon's knowledge, there are no differences in Qwest's processes as to these issues that would lead to a different result in Colorado, Idaho, Iowa, Nebraska, North Dakota, Montana, Utah, Washington, Wyoming, Arizona, or any other Qwest state.² The data omissions discussed here will be the same across states.

The bottom line is that Qwest has used semantics and a limited interpretation of the PID definition to avoid the logical and proper application of the PID in a manner that would accurately reflect the end-user customer's experience. Although Qwest is quick to assert that issues should be dealt with through CMP or long-term PID administration, CLECs should not have to incur further delay in obtaining relief when Qwest should have been reporting needed data all along. If it had done so, the end user customer should have seen improvement by now. Eschelon's foremost concern is the experience of the end-user customer, Eschelon cannot compete if it cannot deliver a quality transition when a customer decides to switch to a competitive carrier. The focus of this entire inquiry should remain on that end user customer's experience. Qwest should not receive 271 approval until the end-user customer's experience improves and that improvement is documented and verified.

1. Qwest Escalation Trouble Reports are Not Reported in the Data.

Qwest admits that, after months of providing allegedly exhaustive data for testing, it is only now beginning to provide "new data" that is "based on customer calls reporting *service order accuracy* problems to *Qwest's service delivery centers* within the reporting month of order completion." See Qwest II August 26, 2002, Reply, p. 26 (emphasis added).³ Qwest suggests that its brief experience in capturing this "new data" shows that the impact of the data is minor. See *id.* The situation is not new, and the impact on CLECs and their customers is not minor. Qwest limits its description of the service delivery center (*i.e.*, escalation ticket via ISC or CSIE) omission to service order accuracy errors. See *id.* Although service order and manual handling errors are significant factors, the problem is even broader and includes omission of other service impacting problems that occur on or near the due date. This is a significant omission. Approximately *half* of Eschelon's troubles within 30 days of installation are reported through the escalation ticket process (as opposed to the trouble desk). Although Qwest denies a problem and

² For example, the Qwest PCAT language cited below, which directs CLECs to submit trouble reports through the service delivery centers, applies to all Qwest states.

³ Reply Comments of Qwest Communications International Inc. In Support of Consolidated Application, *In the Matter of Qwest Communications International, Inc. Consolidated Application for Authority to Provide In-Region, InterLATA Services in Montana, Utah, Washington, and Wyoming* (Qwest II) FCC Docket NO. 02-189 ("Qwest II August 26, 2002, Reply").

attempts to suggest that there must be problems with Eschelon's data, this omission certainly seems to go a long ways toward explaining why Qwest's data has not reflected the customer affecting problems that Eschelon has long pointed out to Qwest.⁴

For reporting troubles related to new installations, Qwest's process is, and has been for a long time,⁵ that Qwest requires CLECs to call the service delivery centers (*i.e.*, not repair) if the trouble occurs within 72 business hours of the installation. Qwest's documented process states:

"Submitting Trouble Reports

The maintenance and repair process begins with the discovery that a service is not functioning properly. This can occur when your end-user realizes they are experiencing poor sound quality, no dial tone or another trouble condition with their telephone service and contacts your customer service organization for assistance or, utilizing your own network testing, monitoring and surveillance tools, you discover a trouble condition.

- **Recent Service Request Activity**

If your service request was completed within the past 72 business hours contact Qwest's Interconnect Service Center (ISC) at 888-796-9087 for assistance. After researching the issue, the Customer Service Inquiry and Education Center (CSIE) will contact you regarding resolution of your issue.

If your service request was completed more than 72 business hours ago, and you determined the problem is in Qwest's network as described above, submit your trouble report to Qwest in one of two ways." [describing the two ways to report trouble after 72 business hours as using CEMR or calling Qwest repair.]

⁴ Although Eschelon had some level of participation in early PID discussions, those occurred before Eschelon had much experience ordering UNE-P. As explained in the Affidavit of Lynne Powers (Ex. 4; AZ E-12), when Eschelon started ordering UNE-P, the problems were so extensive that Eschelon had to stop ordering it. Those problems and the related commercial experience would have provided insight into additional development of the PIDs and PAPs. But, after an agreement with Qwest, Eschelon was absent from the 271 proceedings while these issues were addressed. The workshops were for the most part over, and the PIDs developed, by the time Eschelon could again participate in 271 proceedings. Eschelon recently participated in a two-day 271 workshop in Arizona, where Eschelon heard information about the PIDs and saw even more clearly that Qwest is not including this data. Of course, Qwest has been aware of the issues during this entire time period. Qwest is familiar with its own process requiring use of the escalation process for trouble reports. Also, Eschelon has provided monthly performance Report Cards to Qwest since January of 2001 that have highlighted the service affecting problems and, in particular, the substantial problems related to OP-5 (Eschelon's E-3 on its Report Card). See Exhibits 8-9 (AZ E-5 to E-8).

⁵ When Eschelon complained that Qwest was not following aspects of this process in CMP Change Request #PC120301-5, Qwest told Eschelon that non-compliance was an "isolated incident." See <http://www.qwest.com/wholesale/cmp/changerequest.html>.

See Qwest's PCAT.⁶

Despite this document process for "Submitting Trouble Reports" within 72 business hours, Qwest omits troubles reported through the service delivery center (*i.e.*, *escalation* tickets) because Qwest has chosen to limit OP-5 "to capture only situations in which *trouble* tickets are issued." See Qwest II August 26, 2002, Reply, p. 25 (emphasis added).⁷ Qwest argues that, because it does not issue a trouble ticket in certain situations, it need not count those problems as reported troubles. See *id.* Qwest neglects to mention that in many of these situations, although a trouble ticket is not issued, it *does* issue an escalation ticket.* Semantics aside, both trouble and escalation tickets reflect established methods of reporting trouble. The description for OP-5 specifically requires Qwest to include "*All* trouble reports (for both out-of-service and *service affecting* conditions)." See PID Description OP-5 (emphasis added). Eschelon has been complaining that Qwest's processes create service affecting problems since the spring of 2000, and those problems remain today. See Ex. 7 (AZ E-1). If trouble is reported immediately, something went wrong that increases the likelihood that the end user customer will view the transition to a CLEC as a bad experience. OP-5 is supposed to be measuring this very problem.

By not capturing an entire category of problems that are so serious that they prompt the customer to call the service centers to escalate troubles for resolution immediately, Qwest is omitting perhaps the single most important information needed to analyze the experience of the end user customer when switching carriers on an Off-Net basis.⁸ That experience is at the heart of 271 compliance. Yet, these immediate, pressing trouble reports have not been captured in the data upon which Qwest has claimed 271 compliance. To those without commercial experience in Qwest territory, Qwest's claims may read as though "customer calls reporting service order accuracy problems to Qwest's service delivery centers" are rare occurrences. See Qwest II August 26, 2002, Reply, p. 26. Nowhere in its Reply does Qwest make the connection that – far from a rare situation – calling the service delivery centers is Qwest's required, documented process for reporting troubles during the time period when serious, service affecting troubles are most likely: the first 72 business hours after installation. By not making this connection, the problem is obscured.

⁶ See <http://www.qwest.com/wholesale/clecs/maintenance.html>.

⁷ According to the Liberty Consulting Group Qwest Performance Measure Release Report for OP-5 (page 3), Qwest uses WFAC repair data in the numerator and RSOR data in the denominator. To Eschelon's knowledge, neither WFAC nor RSOR contains escalation trouble reports.

⁸ In Eschelon's experience, escalation tickets seldom also result in trouble tickets for the same issue before resolution. If trouble tickets are related to an escalation ticket, they should refer to the related escalation ticket. Eschelon finds little or no reference to escalation tickets in Qwest trouble ticket information.

⁹ Eschelon has its own switches for providing voice service. When using its switches to serve its customers, Eschelon orders collocation, loops, *etc.*, from Qwest. In some cases (particularly when a customer is outside of the area served by Eschelon's switch), Eschelon also orders UNE-E, UNE-P, or resale from Qwest to serve customers. Eschelon often refers to customers and lines served through Eschelon's own switching Facilities as "On-Net" or "On-Switch" and customers and lines served through UNE-E, UNE-P, or resale as "Off-Net."

Similarly, Qwest suggests that the scenarios not being addressed by Qwest's limited application of OP-5 are "limited." *See* AZ Tr. Vol. I, p. 74, In 15 (Ex. 10). Qwest has described the problem, for example, as follows:

"There is limited scenarios where, because a line or a feature is completely omitted from an order, that once that service isn't working, a trouble ticket can fix that. So if a feature has been completely left off an order, not misrepresented, but completely omitted, at the time either a retail or a wholesale customer is reporting trouble, from a maintenance standpoint, that feature isn't not working, it doesn't exist on the customer's record. And both our retail and our wholesale customers are turned back to the marketing department, the interconnect service center in the case of wholesale, to get an order issued to actually go in and provision the service. That scenario does not get captured currently in our OP-5 measure."

Id. p. 72, In 15 – p. 74, ln 4 (Chris Viveros of Qwest). As with the statements in Qwest's Reply, this testimony suggests only minimal involvement of the service delivery centers.¹⁰ Qwest does not point out that it is describing situations that occur after the first 72 business hours after installation. Because Qwest describes limited scenarios without explaining that the standard trouble reporting process is to call the service delivery centers to open an escalation ticket within 72 business hours of installation, an impression is created that the omissions in the data are minor when they are, in fact, significant. A tester or party without commercial experience in using the escalation ticket process may not catch this distinction, but Eschelon deals regularly with the customer affecting problems that customers notice immediately but are not captured. Eschelon has been bringing these customer affecting problems to Qwest's attention for some time.

Put simply, Qwest requires CLECs to report troubles within 72 business hours of installation through the Escalation ticket process (using the service delivery centers), but at the same time applies OP-5 to trouble tickets reported in repair without counting these escalation tickets. By making the semantic distinctions leading to this result, Qwest has effectively precluded the most common category of serious customer affecting troubles from measurement.

¹⁰ Moreover, the process described by Mr. Viveros is not the documented Qwest process. Qwest does not "turn back" customers to the interconnect center. Qwest repair is supposed to contact interconnect to have the service order issued in those situations, even when this process applies (which is not in the first 72 business hours). *See* Qwest Response to CR #PC101001-1, in which Qwest states: "When a CLEC calls the Repair Center to report trouble on their end users service, the Repair Center will issue a repair ticket and forward the ticket to the appropriate screening group. If the screening group determines the problem needs to be resolved with a service order, the screener will refer the problem to the Interconnect Service Center (ISC). The ISC will initiate the subsequent order resulting from a Qwest error on the LSR or will contact the CLEC on errors resulting from a CLEC error on the LSR."

a. Semantic distinctions without a difference.

OP-S does not use the terms “trouble ticket” or “repair.” There is no basis in the language for limiting reported troubles to trouble tickets issued by the Qwest repair desk, as suggested by Qwest. *See* Qwest II August 26, 2002, Reply, p. 25. As discussed below, there are also policy reasons for not limiting OP-S in this manner. Before the service order completes (a period which is included in OP-5B), escalation tickets are the *only* tickets that Qwest will issue for virtually all reported troubles. Therefore, Qwest needs to capture the escalation, as well as trouble, tickets.” Both are “trouble reports” within the meaning of OP-5. (Both OP-5A and OP-5B use the term “trouble reports.”)¹² In fact, Qwest itself identifies the escalation ticket process (“Recent Service Request Activity”) as part of the process for “Submitting **Trouble Reports**” on its website. (See PCAT, quoted above; emphasis added.) Particularly because Qwest directs CLECs to use the escalation process through the service delivery centers to submit “trouble reports,” Qwest should have been including all of the escalation tickets in the “trouble reports” in the data counted for this measure and provided to the testers.

b. Qwest requires use of escalation ticket process in first 72 hours, **but** does not provide information to validate and track troubles.

Although Qwest’s documented process requires CLECs to report troubles by calling the service delivery centers to open escalation tickets within 72 business, Qwest does not provide to CLECs information sufficient to validate these escalation tickets and any associated charges. Eschelon has reviewed Qwest histories in the Qwest Non Design DLETH to attempt to locate known escalation histories, but the Qwest Non Design DLETH customer histories show no indication of troubles reported through the documented escalation trouble report process. Orders that have experienced significant service affecting troubles in the first days show no trouble history at all in Qwest’s Non Design DLETH customer histories. If Eschelon did not record its own histories of escalated troubles, it would not be able to track these troubles at all, much less verify them with Qwest. This is true even though Eschelon used Qwest’s established process to report the troubles.

As indicated, this is a significant omission. Approximately *half* of Eschelon’s troubles within 30 days of installation are reported through the escalation ticket process. In some cases, Eschelon must open more than one escalation ticket to report troubles on the same order because more than one error occurred and the service delivery center corrects one problem but not others, Qwest is not capturing these reported troubles.

¹¹ Additionally, it appears that Qwest is including the order completions when counting number of orders while omitting the related escalation tickets which reflect trouble reports.

¹² The exclusion to OP-5 for troubles received on day of installation before the provisioning order is closed as complete is expressly limited to “OP-5A.” Therefore, there is no such exclusion with respect to OP-5B. Since inception of OP-5, Qwest should have been providing for OP-5B troubles received on the day **of** installation before the provisioning order is closed as complete, regardless of whether those reports were submitted through the repair desk or per the process through the service delivery centers.

Although Qwest claims that the omissions in its data are insignificant, a doubling effect on the number of trouble reports within the reporting period is very significant.

Eschelon has been including service affecting troubles in its performance measure for Qwest's new service installation quality. Qwest has had this data available to it on a monthly basis since January of 2001 and could have identified these issues earlier. For Off-Net orders, Qwest's performance was above 60% only once in a recent 6-month period. See Ex. 9 (AZ E-7). From December of 2001 through May of 2002, Qwest's performance for new service installation quality for Off-Net orders averaged 49.3%, and the trend is downward. See *id.* This means that, ***more than 50% of the time***, these customers experienced service affecting troubles within 30 days of installation. As this figure (which is much larger than that reported by Qwest) shows, including "all" troubles that are "service affecting" in this measure makes a significant difference. Doing so, however, is required by the plain language of OP-5. Qwest's retail customers do not regularly experience more than 50% of orders having troubles within 30 days of installation,¹³ and Qwest's wholesale customers should not be subjected to this experience either. This discriminatory situation needs to be corrected before Qwest is allowed to enter the in-region, interLATA market.

- c. Commercial experience assists in identifying pressing service affecting issues.

Qwest argues that its processes have been fully tested. Without the benefit of commercial experience (such as that of carriers who were absent for most of the process, such as Eschelon and McLeod), a pseudo-CLEC or other such party reviewing the data would not necessarily identify the same experiences.¹⁴ For example, a pseudo-CLEC may observe that an order never completes or that an order completes but the work itself was not actually done (such as when an RCMAC error is cleared instead of being corrected). While it may seem that the test captured the issue because an error was noticed, the magnitude of the problem is not captured. In a simulated environment, although the problem may occur, it is not accompanied by a real end-user customer calling to complain and demand immediate resolution. The fact that the order was not completed may be noted but not resolved. A live customer is not going to wait until the mystery is solved. The customer will immediately call the CLEC to complain. When that happens, another set of activities is triggered, such as the escalation ticket process when the complaint is received in the first 72 business hours. Even when a "friendly" is used to simulate the actual end-user customer experience, generally this involves use of additional lines or other non-critical services. A simulated setting is very different from a real business customer calling to complain that it is losing thousands of dollars in business because its customers cannot reach the business by telephone due to trouble with a conversion. Because Eschelon deals with these live, critical issues, it has been tracking

¹³ AZ Tr. Val. I, p. 51, lns 3-7 (Ex. 10).

¹⁴ Parties without commercial experience in these areas must rely on the information and explanations provided to them. As discussed in Section 1, semantics may obscure issues, and some differences may not seem meaningful without the benefit of commercial experience to clarify their meaning.

service affecting issues, including the pressing problems reflected in escalation tickets. Qwest's commercial performance shows that 271 approval at this time would be premature. These are not fine points that can be worked out in long-term PID administration or the CMP. These are serious, end-user customer impacting problems that show the market is not truly open to competition.

- d. Qwest should have been including these trouble reports in the data all along.

Qwest should not be rewarded with 271 approval for having failed to count data that is required on the face of a PID definition that has been in place for a long time. Although Qwest is quick to assert that issues should be dealt with through CMP or long-term PID administration,¹⁵ CLECs should not have to incur further delay in obtaining relief when Qwest should have been reporting needed data all along. PO-5B expressly includes "trouble reports reported by the CLEC on or after the day the order is installed and prior to the completion of the order in Qwest's service order processor." Qwest knows full well that, before completion of the order in its service order processor, Qwest requires escalation tickets and not trouble tickets, per its process for "Submitting Trouble Reports." Qwest has nonetheless elected to provide trouble and not all escalation tickets for OP-5 – to the exclusion of some of the most serious problems affecting end user customers.

This is not the only measure for which this is the case. For example, a Liberty Consulting Report and associated comments by AT&T state:

"Subsequent to Liberty's audit of OP-17A (and OP-17B) and its data tracking work, Qwest made changes to its methods to derive the new OP-17 measures: Reportedly, Qwest has begun to include a new data set in results reported for OP-17 beginning with June 2002. Specifically, Qwest now captures data for and includes in the measure those situations in which a disconnect-in-error is resolved *via a call to Qwest's escalation call center*. As noted above, *previously Qwest only included cases in which the trouble desk opened a trouble report upon customer request*. Liberty did not audit this new method, but recommends that Qwest make the appropriate modifications to its business requirements and system documentation to reflect these changes, and that it propose any changes to the PID as necessary. [AT&T Comment – As AT&T has previously commented on, Qwest's process for accounting for OP-17 misses was not compliant with any version of the OP-17 PID. What Liberty ironically characterizes as a "new method" of capturing OP-17 data looks more like what Qwest should have been doing all along. Unfortunately, Liberty's failure to identify Qwest's many instances of PID non-compliant tracking of misses in an observation or exception resulted in the ill-founded conclusion that Qwest's "new method" need not be

¹⁵ For the reasons discussed here and in Eschelon's previous Ex Parte Comments, the new measures Qwest is proposing are not going to capture the problem adequately. See Eschelon Ex Parte Comments, pp. 9-10.

audited by Liberty. For all the aforementioned reasons. AT&T requests that Liberty audit the OP-17 performance measurement to determine if Qwest's latest version is any closer to being PID-compliant.]”

See Audit report issued by Liberty Consulting regarding LNP-related Performance Indicator Definitions (“PIDs”) OP-17 (A & B) and MR-11 (Aug. 19, 2002) (with comments of AT&T to the Report indicated with underlining) (emphasis added).

AT&T's recent experience validates Eschelon's conclusion that Qwest has not been reporting escalation tickets in its data, even though it requires CLECs to use the escalation process (and not the trouble desk) to report such troubles. With respect to its situation, AT&T argued: “Because this data relates to serious problems that AT&T and its customers have experienced in having service disconnected during the conversion of the end-user customer from Qwest to AT&T, it is critical that Qwest's performance under these PIDs is accurately and properly measured before this Commission reaches any conclusion regarding Qwest's compliance with Checklist Item 11.”¹⁶ Eschelon agrees that service affecting issues must be accurately and properly measured and tested before Qwest is granted 271 approval.

2. Service Affecting Translation Errors and Omissions Not Captured in Data.

Qwest admits that, when a CLEC reports a problem with a line or feature “not indicated on the order,” Qwest does not issue a trouble ticket and Qwest has not been capturing this data. *See* Qwest II August 26, 2002, Reply, pp. 25-26. Qwest claims, for example, that: “[I]f the corrective action for this issue such as a feature is to issue an order, not a trouble ticket, then OP-5 was never defined to capture that.” *See* AZ Tr. Vol. I, p. 62, Ins 18-21 (Qwest I Eschelon Ex. 10). As discussed, if the corrective action was prompted by a trouble report (including via escalations), OP-5 was designed to capture the issue. Moreover, service order errors are not the only errors not being captured in the data for these types of problems (line and feature issues, and in some cases, complete outages). Even when the CLEC LSR and the Qwest service order contain the same information (*i.e.*, no service order error), a line or feature error may occur in the Qwest translation, resulting in a service affecting condition. In these cases, Qwest takes corrective actions (such as contacting RCMAC directly) without issuing a trouble ticket. Because Qwest has suggested that it is tracking only trouble tickets, *see id.*, it does not appear to be capturing these errors. These errors, however, result in service affecting problems ranging from feature issues to complete loss of dial tone. Even feature problems can be as significant of a problem for customers as a loss of dial tone. If hunting is missing from the main line, for example, a business will be able to receive only one call at a time, and other customers calling the business will receive a busy signal.

¹⁶ AT&T's Response to Qwest Corporation's Motion to Supplement the Record, *In the Matter of a Commission Investigation Into Qwest's Compliance with Sec. 271(c)(2)(B) of the Telecommunications Act of 1996; Checklist Items 1, 2, 4, 5, 6, 11, 13 and 14*, Minnesota Docket No. P-421/CI-01-1371, p. 2 (Sept. 3, 2002).

Even worse for many businesses, if the call forwarding/don't answer feature is missing or not working properly, customers of the business will not even get a busy signal; the line will ring with no answer. This makes the business look very bad, as though no one is working during business hours. If a feature that is significant to a customer is missing or does not work properly when that customer switches to a CLEC, the customer will view the transition to a competitive carrier as an adverse experience. These errors are not related to errors in the writing of the service orders, but they appear to be errors that Qwest is not reporting in its data. The order will be counted as a completed order with no indication that a trouble was reported.

3. Service Affecting Troubles that Require Qwest to Tag Cable Pairs at Demarcation do Not Appear to be Captured in the Data.

Another type of trouble resolution that does not appear to be captured in the Qwest data are troubles that require a Qwest dispatch to "tag," or identify, cable pairs at the demarcation point for new lines. Requests for a pair to be tagged occur at the time of installation when a field service technician for the customer is trying to connect service at the demarcation point. Many of these trouble reports indicate defective cable pairs or missing jumpers on the Qwest distribution frame. Qwest usually issues a trouble (CEMR) ticket for these reports, but Qwest codes them as a customer issue. Therefore, they are not included as troubles when they should be. The Qwest records also identify that the reports may also generate an erroneous time and material bill from Qwest.

4 Recently Provided Data Confirm That Manual Handling Clearly Results in a High Degree of Customer Affecting Service Order Errors.

Although Qwest service order errors are not the only service affecting problems that have been omitted from Qwest's data, they are a significant problem. Qwest claims, however, that its service orders are virtually error free. See Qwest II August 26, 2002, Reply, p. 26. Data that have only recently become available to CLECs, however, show that this is not the case. Qwest has recently started to provide a Pending Service Order Notification ("PSO") to CLECs about an hour after the FOC (also known as LSRC) is received. The PSO provides service order detail (information from the Service and Equipment ("S & E") section of the Qwest service order) to requesting CLECs. Although extremely resource-intensive to do so, a CLEC can now compare the information in the PSO to the order confirmations (which show the information from the LSRs). A CLEC may compare them, for example, to confirm whether the same USOCs that are on the LSR are also on the Qwest service order. In doing so, a CLEC may identify and attempt to get Qwest to correct service order errors before the due date. Qwest began providing the PSOs to CLECs as part of Release 10.1 approximately two weeks ago. Eschelon does not have the resources to review all of the data, nor should it be Eschelon's burden to perform Qwest quality control. Eschelon has, however, compared new Off-Net orders with the PSOs to attempt to determine the extent of the

service order error problem. In addition, Eschelon plans to expand this effort to review every PSN, despite the resource strain, due to the significance of this issue.

The results already confirm that the manual handling of service orders is resulting in unacceptable levels of customer affecting errors. Eschelon has reviewed every LSR Off Net conversion order for which it has received a PSN since Qwest began providing them (August 26, 2002 through September 3, 2002). For this category of orders to date, **40% of the service orders manually typed by Qwest had service affecting errors.** (There were also errors that were not customer impacting but did affect billing, which were not included in this percentage.)” This is a high rate of error and, as discussed previously, these errors have not been captured in Qwest’s data. Now, as Eschelon and other CLECs use the PSN data to identify errors before the due date, even fewer of these errors may be captured in the data. Qwest’s performance will appear to improve when, in reality, CLECs are bearing the expense and burden of identifying and working to correct Qwest errors. Although Qwest should correct the underlying problem to avoid this situation, as long as CLECs need to rely on the PSNs, a measure should be developed and tested to capture these errors and to relate them to a performance assurance plan.

Eschelon must point out that it was reluctant to request the PSNs because the effect is to shift the burden that should be on Qwest to accurately process service orders to Eschelon to expend resources comparing LSRs and PSNs using a manual, resource-intensive process. It had to be done, however, to attempt to reduce the frequency of service affecting problems on the due date resulting from Qwest service order writing errors. Eschelon is not the only CLEC to identify this issue. At least two other CLECs made a similar request.” The fact that Eschelon would make this request and devote substantial resources to this effort shows the magnitude of the service affecting problems caused by Qwest service order writing errors and the genuineness of Eschelon’s desire to avoid these problems. Eschelon’s foremost concern is the experience of the end-user customer. The focus of this entire inquiry should remain on that experience. Qwest should not receive 271 approval until the end-user customer’s experience improves and that improvement is documented and verified

¹⁷ The relevant statistic, for determining the impact of manual handling on error rates, is the percentage of manually typed orders with errors. This is particularly true with Qwest because of the significant level of manual handling used by Qwest. Even if the percentage of all of the orders (including flow through orders) is used, however, 14% of the total orders in this category had service affecting errors. None of these errors are being captured in the Qwest data. (The FOCs now have an indicator to show whether the order went flow through, so Eschelon is relying on that indicator when presenting these percentages.)

¹⁸ Eschelon made its request in CMP CR #SCR073001-2. McLeod and another CLEC made similar requests in CR #5466535 and #SCR073001-5. Initially, CLECs asked that the S&E information appear on the FOC. Qwest indicated that it could not do so, but that it could provide the information in a separate document (the PSN). Qwest then closed the other CRs and opened its own CR for this issue (CR #25497). Qwest then worked its CR.

B. REPORTING OF UNE-E AND UNE-P

Eschelon previously pointed out that Qwest is already including lines provisioned as resale (UNE-Eschelon, or UNE-E, lines) in its PID data for UNE-P. Qwest claims that it “properly categorized” those lines. *See* Williams Commercial Performance Reply Declaration, p. 45. Qwest’s response fails to address the purpose of reporting and whether the manner in which this information has been reported serves that purpose.

To be useful, a measure should reflect whether a process was actually tested for the indicated volume of orders. The volume of orders that Qwest reports for UNE-P would suggest that UNE-P ordering, provisioning, and billing processes have been tested in those volumes. Qwest chose, however, to include a product that is not ordered, provisioned, or billed in the same manner as UNE-P with its UNE-P lines for reporting purposes. And, it did so retroactively after it made this decision. Qwest has called its product UNE-Star (*or*; in some cases, UNE-E or UNE-McLeod - UNE-M).¹⁹ Eschelon and McLeod entered into agreements with Qwest in the Fall of 2000 to obtain the new platform product (later referred to as UNE-Star) from Qwest. Both companies, however, **remained on resale** for ordering, provisioning, and billing purposes.²⁰ Qwest answered questions about the applicable processes for UNE-Star as follows:

How will orders be placed by Eschelon? Through existing resale process.
How will Qwest process orders? Through existing resale process.
How will Eschelon be billed? Qwest continues to bill lines, features at Resale rates through existing resale billing process.

See Exhibit 20 (attached).²¹ This is still true today.

Although priced differently through a manual true-up process, the lines were ordered, provisioned, and billed as resale. *See id.*²² The use of resale was supposed to be an interim process until Qwest could physically provide the new platform product. *See id.* (describing “long-term” plan to develop processes for “UNE-Star” platform product). Those processes have not been developed, however, and Eschelon continues to order

¹⁹ Generally, the parties have been using UNE-Star, UNE-Eschelon (“UNE-E”), and UNE-McLeod (“UNE-M”) somewhat interchangeably. With respect to Qwest’s system changes relating to “UNE-Star,” however, there is a difference. Qwest has said that those changes (part of Release 9.0, *etc.*) were made as part of an as yet unfinished effort to mechanize UNE-E and UNE-M, so that Qwest will finally provide accurate bills for the product. And, after that mechanization *is* done, Eschelon and McLeod could order UNE-Star *per* that process. To the extent that Qwest uses “UNE-Star” to refer to the product related to the system changes in its Release(s), neither Eschelon nor McLeod yet order that product. Both are ordering resale and obtaining a pricing adjustment through a manual true up process. Unfortunately, Qwest’s current proposal for mechanizing UNE-E to allow accurate billing relies heavily on manual handling that could result in service affecting problems during the conversion. Given that Eschelon’s goal all along has been to avoid such problems, the proposal is unattractive and not what Eschelon bargained for.

²⁰ *See* AZ Tr. Vol. I, p. 28, ln 21 – p. 26, ln 1 & Vol. II, p. 293, lns 17-24 (Qwest I Eschelon Exs. 10-11).

²¹ In AZ, this is Ex. 2 to Powers Affidavit (AZ Ex. E-12); *see also* AZ Tr. Vol. II, p.323, lns 1-15 (Qwest I Eschelon Ex. 11).

²² AZ Tr. Vol. II, p. 301, lns 7-9; p. 302, lns 7-8 (Qwest I Eschelon Ex. 11).

resale today for this product.²³ The same is true for Qwest's other largest CLEC wholesale customer, McLeod.²⁴ Therefore, the processes in place for this product are the resale processes. Those processes differ from the processes used for UNE-P.

Qwest, however, chose to include the UNE-Star lines, which are ordered as resale, in its UNE-P reporting. In approximately November of 2001, Qwest changed its reporting not only on a going forward basis, but also retroactively to January of 2001 so that months previously reported as business (resale) lines were then reported as UNE-P lines. Qwest did so after a third party Functionality Test evaluation showed a disparity for UNE-P and a lack of commercial volume.²⁵

Qwest points to the interconnection agreement between Eschelon and Qwest as the basis for the reporting change. *See* Williams Commercial Performance Reply Declaration ¶ 79. The interconnection agreement established pricing.²⁶ The purpose of the reporting, however, is to assist in analyzing whether UNE-P can be successfully ordered, provisioned, and billed in commercial volumes. The volumes of UNE-Star lines, which were provisioned as resale, provide no evidence as to this issue.

Although not apparent from Qwest's performance reporting, Eschelon has only recently started to order UNE-P from Qwest using the ordering, provisioning, and billing processes for UNE-P.²⁷ With respect to UNE-Star, for purposes of measuring the

²³ See note 19.

²⁴ See AZ Tr. Vol. II, p. 293, Ins 18-19 (Qwest I Eschelon Ex. 11).

²⁵ "The only performance measure disaggregation that resulted in disparity during the Functionality Test that lacked commercial volume for making future determinations was UNE-P. However, *subsequent to the evaluation* the number of UNE-Ps in service has increased from 1000 to over 15,000. This increase provided the commercial volume necessary to make a valid parity determination." DRAFT Final Report of the Qwest OSS Test, Cap Gemini Ernst & Young, Version 1, p. 9 (Dec. 21, 2001) (emphasis added) (available online at <http://www.cc.state.az.us/utility/telecom/Qwest27M>).

²⁶ Nothing on the face of that agreement indicates that the lines will be ordered, provisioned, and billed as resale. After all, both Eschelon and McLeod anticipated that the lack of processes would be a short-term problem. See Exhibit 20. Although Qwest claims that it disclosed the reporting change in Summary Notes, see Williams Commercial Performance Reply Declaration ¶¶ 11-19, readers would not understand, from those Notes, that lines provisioned as resale were being reported in a category designed to measure the different processes used for ordering, provisioning, and billing of UNE-P.

²⁷ Eschelon ordered a small number of UNE-P lines from Qwest in the Spring of 2000, but the problems with the orders were so prohibitive that Eschelon stopped ordering UNE-P. See Affidavit of Lynne Powers (Ex. 4; AZ E-12). Eschelon only started ordering UNE-P from Qwest again in the Spring of this year. In the Spring 012002, Eschelon also started to migrate a number of its existing WE-Star lines that were ordered on a resale basis to UNE-P. This migration is being handled on a project basis. Although the migration is much closer to the ordering and provisioning process used for ordinary UNE-P orders than the resale processes used for UNE-Star, the process is still different because of the special, project handling. Because Qwest is hand holding the orders migrating from UNE-Star to UNE-P, any volume for UNE-P that includes the project orders will reflect the higher performance for the hand-held UNE-P migration project orders. Roughly, less than 20% of the UNE-P lines (excluding UNE-Star lines ordered as resale) ordered by Eschelon from March through July of 2002 were new WE-P orders processed through the regular (non-project) process. The remainder of Eschelon UNE-P orders received special handling as pan of the process to migrate lines from UNE-Star to UNE-P.

Ms. Marlene H. Dortch
September 4, 2002
Page 14 of 14

ordering, provisioning, and billing of UNE-P, Qwest did not “properly categorize[] Eschelon’s UNE-Star lines as UNE-P,” as claimed by Qwest. See Williams Commercial Performance Reply Declaration, p. 45.

C. CONCLUSION

Eschelon appreciates the opportunity to submit these written Ex Parte Comments. Eschelon is available to answer questions as well.

Sincerely,

Karen L. Clauson
Senior Director of Interconnection
Eschelon Telecom, Inc.
730 Second Avenue South, Suite 1200
Minneapolis, MN 55402
612-436-6026

cc: Filed electronically & email distribution

-----Original Message-----

From: Judy Rixe [SMTP:jrix@uswest.com]
Sent: Thursday, January 11, 2001 8:57 AM
To: Morrisette, Garth M.
cc: Clauson, Karen L.; Kevin Saville; Judy Rixe
Subject: UNE-Star Implementation

Garth--

Freddie Pennington (product Management) will elaborate more at today's meeting, BUT here's some of that information that I promised you regarding the internal efforts of Qwest to implement the DEAL:

Qwest has identified a Process Implementation CORE team to develop short and long-term solutions. This team meets weekly and provides monthly updates to an Executive Management team composed of: Dana Filip, Christy Doherty, Kathy Kochis, Jasmin Espy and Audrey McKenney. The CORE team (35+ players) has representatives from: Finance, RCMAC, UNE Process, Wholesale Advocacy, Repair Process, Resale Product Management, Compliance, Customer Solutions, Billing, Switched Access Process, IT, Regulatory, Network Planning, PIC Process, Public Policy, Centrex Process, RSID Conversion Process, UNE Product Management and Wholesale Marketing.

Most of the short term objectives have been completed and implemented.

How will orders be placed by Eschelon? Through existing resale process.

How will Qwest process orders? Through existing resale process.

How will Eschelon be billed? Qwest continues to bill lines, features at Resale rates through existing resale billing process.

How will Eschelon be credited? Qwest Finance compares end-of-month billed revenues for 1FB and centrex lines and features to quoted rate by state and issues Eschelon a check for the difference on a monthly basis.

Other short-term areas of concern that are being addressed are:

- Identify how switched access will be suppressed and the information delivered to Eschelon,

- Identify how PIC-C will be suppressed and delivered to Eschelon

- Identify audit process for MOU and how Eschelon will be audited

- Identify how Eschelon will be billed for MOU in excess of 525

- Repair process

- Identify how performance metrics will be captured.

Long-term areas of concerns that have teams developing solutions:

- Identify existing and new USOCs necessary to bill new product platform
- Identify rate elements for new product
- Develop order process for flat-rated UNE-Deal
- Develop provisioning process for flat-rated UNE-Deal
- Develop billing process for flat-rated UNE-Deal
- Identify how Eschelon will be credited in the long term
- Identify how switched access information will be delivered in the long term
- Identify how Eschelon will be audited for MOU
- Identify how performance metrics will be captured
- Identify where line count data is created, who will receive and track it and what happens if commitment NOT met
- Repair process implementation
- Document M&Ps for long term

These bullet points were meant to show you the highlights of what is being worked on and is not a comprehensive list of ALL the work efforts that are going on behind the scenes. Qwest is committed to working with your company to make the DEAL work for you. Don't hesitate to let me know if you have any questions, concerns or require additional information.

Judy

OP-5 – New Service Installation Quality (Continued)

OP-5 – New Service Installation Quality

Purpose: Evaluates quality of ordering and installation of services, focusing on the percentage of average monthly new order installations that were free of trouble reports for thirty (30) calendar days following installation, including the percentage of new service installations that experienced a trouble report on the installation date after the order is reported as work complete by the technician.		
Description: OP-5 Measures the monthly average percentage of new installations that are free of trouble reports within 30 calendar days of initial installation. New installation orders used in calculating this performance indicator (appearing in the numerator and the denominator of the OP-5 formula shown below) are all inward orders for the current and previous reporting periods, including Change (C-type) orders for additional lines. Change order types included in this measurement consist of all C orders representing inward activity (with "I" and "T" action coded line USOCs), ^{NOTE 1} (The average monthly number of new installation orders calculated in the denominator of the formula shown below will be rounded up to the nearest integer whole number.) All trouble reports (for both out-of-service and service-affecting conditions) closed within the reporting period, which were received within thirty (30) days of the original installation of service, including on the day the order is installed are measured (for use in the numerator of the formula shown below), subject to exclusions shown below. Because the trouble reports in the numerator of this measurement are reported on a per-line basis and therefore may exceed the number of orders it is possible for the numerator, and thus the reported result, to be negative. Accordingly, a lower limit of zero will be applied to the numerator of this measurement, reflecting that there cannot be a negative number of "new service installations." ■ Includes both out of service and service affecting trouble reports, subject to exclusions shown		
Reporting Period: One month (for trouble reports); Average of prior and current reporting month (for new installation activity)		Unit of Measure: Percent
Reporting Comparisons: CLEC aggregate, individual CLEC and Qwest Retail results	Disaggregation Reporting: Statewide level	
* The value of the two-month average New Installation Orders completed is rounded up to an integer value.		

OP-5 – New Service Installation Quality (Continued)

Exclusions:	
<ul style="list-style-type: none"> • Trouble reports coded as follows (applies to the trouble reports subtracted from the New Installation Orders in the numerator of OP-5): <ul style="list-style-type: none"> - For products measured from MTAS data trouble reports coded to disposition codes for: Customer Action (6); Non-Telco Plant (11); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-Qwest (includes CPE, Customer Instruction, Carrier, Alternate Provider (13); - For products measured from WFA (WorkforceAdministration) data, trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE) • Subsequent trouble reports of any trouble on the installed service before the original trouble report is closed. • Information tickets generated for internal Qwest system/network monitoring purposes. • Trouble reports on the day of installation before the installation work is reported by the technician/installer as complete. • Disconnect, From (another form of disconnect) and Record order types. • Records involving official company services. • Records with invalid due dates, application dates, or start dates. • Records with invalid completion, cleared, or closed dates. • Records with invalid product codes. • Records missing data essential to the calculation of the measurement per the PID. 	
Product Reporting:	Standards:
•	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Qwest DSL	Parity with retail service
Primary ISDN	Parity with retail service
DSO	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• Unbundled Network Element – Platform (UNE-P) (POTS)	Parity with like retail service
• Unbundled Network Element – Platform (UNE-P) (Centrex 21)	Parity with retail Centrex 21
• Unbundled Network Element – Platform (UNE-P) (Centrex)	Parity with retail Centrex
• Shared Loop/Line Sharing	Parity with retail RES & BUS POTS
• Sub-Loop Unbundling	Diagnostic
■ LIS Trunks	Parity with Feature Group D (aggregate)

OP-5 – New Service Installation Quality (Continued)

UDIT – DS1 level		Parity with retail DSI Private Lines
UDIT – Above DS1 level		Parity with retail Private Lines above DS 1 level
Dark Fiber – IOF		Diagnostic
• Unbundled Loops:		
Analog Loop		Parity with retail Res & Bus POTS with dispatch
Non-loaded Loop (2-wire)		Parity with retail ISDN BRI
Non-loaded Loop (4-wire)		Parity with retail DS1
DS1-capable Loop		Parity with retail DS1
ISDN-capable Loop		Parity with retail ISDN BRI
ADSL-qualified Loop		Parity with retail Qwest DSL with dispatch
Loop types of DS3 and higher bit-rates (aggregate)		Parity with retail DS3 and higher bit-rate services (aggregate)
Dark Fiber – Loop		Diagnostic
• E911/911 Trunks		Parity with retail E911/911 Trunks
• Enhanced Extended	inks (EELs)	Diagnostic
<div> <div> Availability: Available (except as noted below) Under Development <ul style="list-style-type: none"> Reporting of UNE-P Centrex 21 – beginning with Dec 01 data on Jun 02 report </div> <div> Notes: 1. Prior to Aug 01 results, the specified Change order types (i.e., with "I" & "T" action codes) included some orders that do not strictly represent additional lines (in both wholesale and retail results). Specifically these include changes to existing lines, such as conversions, number changes, PIC changes, and class of service changes. Beginning with Aug 01 results Qwest developed the capability to exclude "Change" service orders that do not involve installation of lines. </div> </div>		

**CUMULATIVE
RECEIVED DURING
8/26/02 – 9/07/02'
9/12/02 – 10/4/02**

Off-Net Order Type	Incomplete PSON's (Excluded)⁴	Duplicate PSON's (Excluded)¹	Total PSONs (Minus Exclusions)	Total PSON's with 1 or More Qwest Errors	% of Qwest Errors on Non Flow Through Service Orders
Conversions	13	21	126	32	25%
MACS	15	19	339	35	10%
DSL	4	0	85	4	5%

¹ A few days were not tracked initially simply due to the recency of receiving the data (which was only 'available after Release IO.I) and the need to identify and organize resources to begin doing this Qwest quality control.

² These data are for Off-Net orders. Off-Net includes UNE-P orders and orders placed using resale process (*i.e.*, "UNE-E"). For on-net (*i.e.*, loops to be used with Eschelon's switch) orders, Qwest is providing incomplete data for a large number of PSONS, making comparison impossible. For on-net orders, incomplete information is mainly found in the Eastern and Western Qwest billing regions.

³ Total Off-Net orders (NFT and flow through) = **863**

⁴ Although incomplete PSONs are a greater problem of On-Net order, some Off-Net PSONs are incomplete and incomplete PSONs affecting the analysis are excluded. For example, a PSON with no Service and Equipment section is excluded.

⁵ Qwest is providing duplicate PSONs in some cases for individual orders. Although generally there appear to be no changes in the PSONs, Qwest indicated "Y" for the Order Change Indicator field. For these duplicate PSONs, Eschelon has not initiated activity that would result in a new PSON. Therefore, Qwest appears to be generating the PSONs, though it is unclear whether the PSONs are inadvertent duplicates or actually reflect corrective action.

Received During
8/26/02 – 9/07/02

QWEST SERVICE ORDER ERRORS:
PERSONs (for Off-Net Orders)¹

% Off-Net Orders Indicating Nan-Flow Through (“NFT”) on FOC: 43%²

COMPARISON OF LSRs (i.e., NFT CONFIRMATIONS) v. NFT PERSONS:

Off-Net Order Type	Incomplete PERSON's (Excluded) ³	Duplicate PERSON's (Excluded) ⁴	Total PERSONs (Minus Exclusions)	Total PERSON's with 1 or More Qwest Errors	% of Qwest Errors on Non Flow Through Service Orders
Conversions			28	12	42%
MACS					
DSL					

¹ These data are for Off-Net orders. Off-Net includes UNE-P orders and orders placed using resale process (i.e., “UNE-E”). For on-net (i.e., loops to be used with Eschelon's switch) orders, Qwest is providing incomplete data for a large number of PERSONs, making comparison impossible. For on-net orders, incomplete information is mainly found in the Eastern and Western Qwest billing regions.

² Total Off-Net orders (NFT and flow through) = **65**

³ Although incomplete PERSONs are a greater problem of On-Net order, some Off-Net PERSONs are incomplete and incomplete PERSONs affecting the analysis are excluded. For example, a PERSON with no Service and Equipment section is excluded.

⁴ Qwest is providing duplicate PERSONs in some cases for individual orders. Although generally there appear to be no changes in the PERSONs, Qwest indicated “Y” for the Order Change Indicator field. For these duplicate PERSONs, Eschelon has not initiated activity that would result in a new PERSON. Therefore, Qwest appears to be generating the PERSONs, though it is unclear whether the PERSONs are inadvertent duplicates or actually reflect corrective action.

RECEIVED DURING
8/26/02 - 09/07/02
QWEST SERVICE ORDER ERRORS DETAIL
OFF-NET CONVERSION
PSONS

Redacted--For Public Inspection

PON	DATE PSON RECEIVED	LSR ID	FLOW THROUGH	Customer TN	DD	QWEST ERROR (Q)	What were the errors	Qwest Escalation ticket number.
WA213067DFS	8/27/2002	5042452	NO	(*)	8/26/2002	Q	QWEST: REQUESTED /HTG A MISSING ON TN (*)	146206
UT213332DFS	8/27/2002	5046017	NO	(*)	8/27/2002	Q	REQUESTED NSD & E8C ON 224-8371 MISSED ON SERVICE ORDER	1462637
UT214141DFS	8/27/2002	5048806	NO	(*)	8/29/2002	Q	REQUESTED N13 ON (*) MISSED ON SERVICE ORDER	1462645
AZ213951DFS	8/27/2002	5071823	NO	(*)	9/3/2002	Q	QWEST: ATK USOC ON (*) NOT REQUESTED ON LSR APPEARS ON SERVICE ORDER	1462653
MN214329JMG	8/27/2002	5067532	YES	(*)	8/29/2002	Q	QWEST: RTV1Q NOT REQUESTED ON LSR APPEARS ON SERVICE ORDER	146264
UT210004-3DFS VER 7	8/28/2002	5070243	NO	(*)	8/27/2002	Q	ESM REQUESTED ON LSR FOR TN (*) DOESN'T APPEAR OF PSON	1463541
CO213556DFS	8/28/2002	5071099	NO	(*)	9/6/2002	Q	LSR REQUESTS 1FB CONVERT TO RSX ON NEW ACCT NUMBER PSON SHOWS OUT ACTION FOR 1FB BUT NO IN ACTION ON THE C21 ACCT	1463482
AZ215537DFS	8/29/2002	5087194	NO	(*)	9/13/2002	Q	/TBE A COLLECT CALL/3RD PARTY BILL BLK REQUESTED ON TN (*), NOT ON PSON	1465137
WA216191DFS	8/30/2002	5095874	NO	(*)	9/10/2002	Q	TBE A REQUESTED ON LSR NOT ON PSON	1466777
WA216212DFS	8/30/2002	5096185	YES	(*)	9/17/2002	Q	HTG USOC & /HTG A FID REQUESTED ON LSR NOT ON PSON	1466749
AZ216266DFS	9/4/2002	5097238	NO	(*)	9/12/2002	Q	ESM HAS FEATURE ACT D ON THE LSR BUT IS A CONVERT ON PSON	1472483
UT214007DFS	9/7/2002	5043423	NO	(*)	8/30/2002	Q	REQUESTED TBE A ON LSR PSON SHOWS TBE B, FDJHG MISSING /CFND FID AS REQUESTED ON LSR	1474141
(*) indicates confidential customer								

1000025

Received During
9/12/02 – 9/18/02

QWEST SERVICE ORDER ERRORS:
PSONs (for Off-Net Orders)¹

% Off-Net Orders Indicating Non-Flow Through (“NFT”) on FOC: 50%²

COMPARISON OF LSRs (i.e., NFT CONFIRMATIONS) v. NFT PSONS:

Off-Net Order Type	Incomplete PSON's (Excluded) ³	Duplicate PSON's (Excluded) ⁴	Total PSONs (Minus Exclusions)	Total PSON's with 1 or More Qwest Errors	% of Qwest Errors on Non Flow Through Service Orders
Conversions	1	3	12	4	33%
MACs	2	11	41	8	20%
DSL	4	0	17	3	18%

¹ These data are for Off-Net orders. Off-Net includes UNE-P orders and orders placed using resale process (i.e., “UNE-E”). For on-net (i.e., loops to be used with Eschelon's switch) orders, Qwest is providing incomplete data for a large number of PSONS, making comparison impossible. For on-net orders, incomplete information is mainly found in the Eastern and Western Qwest billing regions.

² Total Off-Net orders (NFT and flow through) = 141

³ Although incomplete PSONs are a greater problem of On-Net order, some Off-Net PSONs are incomplete and incomplete PSONs affecting the analysis are excluded. For example, a PSON with no Service and Equipment section is excluded.

⁴ Qwest is providing duplicate PSONs in some cases for individual orders. Although generally there appear to be no changes in the PSONs, Qwest indicated “Y” for the Order Change Indicator field. For these duplicate PSONs, Eschelon has not initiated activity that would result in a new PSON. Therefore, Qwest appears to be generating the PSONs, though it is unclear whether the PSONs are inadvertent duplicates or actually reflect corrective action.

RECEIVED DURING
9/12/02 - 9/18/02
QWEST SERVICE ORDER ERROR DETAIL
OFF NET PSONS

Redacted--For Public Inspection

PON	DATE PS ON RECEIVED	LSR ID	FLOW THROUGH Y/N	Customer TN	DD	Qwest Error (Q)	Order Chg Indicator Y/N	What were the errors	Qwest Escalation ticket number
AZ219972JMG	9/13/2002	5178064	NO	(*)	9/18/2002	Q		CFD NOT ADDED ON LINE (*)TN WRONG (*). IMA IS SUPPOSED TO HAVE SOMETHING THAT KEEPS THIS FROM HAPPENING.	148245
MN219110JMG	9/12/2002	5170656	NO	(*)	9/19/2002	Q		BY QUEST WHEN COLLECT CALLING/3RD PARTY BLOCK IS REQUESTED DUE TO AN EDIT IN THE QWEST SYSTEM WE ARE UNABLE REQUEST RTVXQ OR RTV1Q.	148315
OR218609GMS	9/13/2002	5172600	NO	(*)	9/20/2002	Q		HUNTING NOT LISTED, BUT WAS APPARENTLY MOVED TO THE RPON	
OR218609-1GMS	9/13/2002	5172975	NO	(*)	9/20/2002	Q		UP ON THIS BECAUSE IT DID NOT DO ANY HARM	
MN217931-1GMS	9/13/2002	5174515	NO	(*)	9/20/2002	Q		N ORDER NOT ON PS ON	148325
AZ220526MAB	9/13/2002	5176227	NO	(*)	9/25/2002	Q	Y	HTG SEQUENCE APPEARS INCORRECT ON PS ON/AFTER ORIGINAL ESCALTION WAS CLOSED	148180
AZ220526MAB	9/13/2002	5176227	NO	(*)	9/25/2002	Q		HTG SEQUENCE APPEARS INCORRECT ON PS ON	148105
MN213056DSLCL-4KM	9/13/2002	5176702	NO	(*)	9/17/2002	Q		HTG SEQUENCE APPEARS INCORRECT ON PS ON	148360
MN216056JMG VER 2	9/12/2002	5112216	NO	(*)	9/19/2002	Q		TBE A COLLECT CALL/3RD PARTY CALL BLK REQUESTED ON LSR DOES NOT APPEAR ON PS ON	
DE220755MAB	9/18/2002	5188745	NO	(*)	9/22/2002	Q		CFBL has incorrect tns	148486
OR221332EDFS	9/16/2002	5183525	NO	(*)	9/19/2002	Q		QWEST LEFT OFF /TBE A (COLLECT CALL/3RD PARTY BLOCK REQUESTED ON LSR, LEFT ON ESM NOT REQUESTED ON LSR	148453
MN217887DSLCKMJ	9/12/2002	5137144	NO	(*)	9/17/2002	Q	Y	Ordered 0444 for PICs on (*), received 0333.	
CO221330MVEMAB	9/16/2002	5181562	NO	(*)	9/23/2002	Q		MWW added to tns. however not on LSR or TBS.	
CUT220989GMS	9/17/2002	5189710	NO	(*)	9/20/2002	Q		Typo in Hunt Group on the PS ON.	148405
WA219989DSLCKMJ	9/16/2002	5182220	NO	(*)	9/24/2002	Q		PIC/LPIC REQUESTED AS NONE ON LSR PS ON SHOWS PIC/LPIC 0444	

0000027

Received During
9/19/02 – 9/27/02

QWEST SERVICE ORDER ERRORS:
PSONs (for Off-Net Orders)'

% Off-Net Orders Indicating Non-Flow Through ("NFT") on FOC: 63%²

COMPARISON OF LSRs (i.e., NFT CONFIRMATIONS) v. NFT PSONS:

Off-Net Order Type	Incomplete PSON's (Excluded) ³	Duplicate PSON's (Excluded) ⁴	Total PSONs (Minus Exclusions)	Total PSON's with 1 or More Qwest Errors	% of Qwest Errors on Non Flow Through Service Orders
Conversions	12	15	38	6	16%
MACs	12	7	170	15	9%
DSL	0	0	41	1	2%

¹ These data are for Off-Net orders. Off-Net includes UNE-P orders and orders placed using resale process (i.e., "UNE-E"). For on-net (i.e., loops to be used with Escabelon's switch) orders, Qwest is providing incomplete data for a large number of PSONS, making comparison impossible. For on-net orders, incomplete information is mainly found in the Eastern and Western Qwest billing regions.

² Total Off-Net orders (NFT and flow through) = **394**

³ Although incomplete PSONS are a greater problem of On-Net order, some Off-Net PSONS are incomplete and incomplete PSONS affecting the analysis are excluded. For example, a PSON with no Service and Equipment section is excluded.

⁴ Qwest is providing duplicate PSONS in some cases for individual orders. Although generally there appear to be no changes in the PSONS, Qwest indicated "Y" for the Order Change Indicator field. For these duplicate PSONS, Eschelon has not initiated activity that would result in a new PSON. Therefore, Qwest appears to be generating the PSONS, though it is unclear whether the PSONS are inadvertent duplicates or actually reflect corrective action.

RECEIVED DURING
9119102 - 09/27/02
QWEST SERVICE ORDER ERROR DETAIL
OFF NET PSON'S

Redacted--For Public Inspection

PON	DATE PSON RECEIVED	MAC, Resale conversion, Onnet conversion	LSR ID	FLOW THROUGH Y/N	Customer JN	DD	QWEST ERROR (Q)	Order Chg Indicator Y/N	What were the errors	Qwest Escalation ticket number
O218496GMS	9/19/2002	R	5196545	N	(*)	9/23/2002	Q		LINES	1487162
/A219754DFS	9/20/2002	R	5199097	N	(*)	9/25/2002	Q		MISSING LINE 1227. No service and equipment data available	1493134
in220508dslckmj	9/25/2002	R	5214327	N	(*)	10/1/2002	Q		PIC/LPIC ON 5047 S/B CHANGED TO 444	N
IR223173ESMM	9/20/2002	M	5219623	N	(*)	9/25/2002	Q		REQUESTED PIC CHANGE ON 0350 BUT NOT DONE.	
CO589202TIH	9/24/2002	M	5223324	N	(*)	9/30/2002	Q	Y	htg IS INCORRECT	1492829
O222022MAB	9/25/2002	M	5238787	N	(*)	9/30/2002	Q		HTG ARANGEMENT WRONG	1495013
O221990CDO	9/24/2002	M	5229723	N	(*)	9/30/2002	Q		POPMY NOT ON LAST LINE ON PSON.	1492926
WA219692ESMM	9/25/2002	M	5241862	N	(*)	9/30/2002	Q		INSTEAD OF TYPING FROM LAST ORDER PER REMARKS QWEST DID ANOTHER CONVERSION ORDER.	1494988
/A223190SMM	9/26/2002	M	5251926	N	(*)	10/1/2002	Q		MISSED DISCO OF 69HON ON (*)	N
O219782MVE	9/25/2002	M	5212919	N	(*)	9/27/2002	Q		OUT ONLY ACTION OF MOVE LISTED ON PSON	N
:O224010MVEJG	9/25/2002	M	5236292	N		9/30/2002	Q	Y	QWEST TYPED THE FORWARDING NUMBER WRONG ON 69J FOR 3250.7819. ALSO WRONG CFBL ON 3520.	N

RECEIVED DURING
9/19/02 - 09/27/02
QWEST SERVICE ORDER ERROR DETAIL
OFF NET PSON'S

Redacted--For Public Inspection

AZ219200DFS	9/23/2002	R	5168084	N	(*)	9/23/2002	Q	Y	REQUESTED CONV OF MWW NOT ON PSON	
CO220232DFS	9/25/2002	R	5229893	N	(*)	9/26/2002	Q	Y	N13 REQUESTED ON THE OC, NOT ON PSON	
CO221374DFS	9/23/2002	R	5192309	N	(*)	9/20/2002	Q	Y	TBEA REQUESTED NOT NOT ON PSON. HTG A FID MISSING ON TN 0606. RTVXN ON 8396 TWICE.	
WA210227DFSNPI	9/23/2002	M	5074642	N	(*)	9/25/2002	Q		69J NOT REQUESTED BUT APPEARS ON PSON. HTG A FID MISSING ON TN 627 4181, 4182	
MN221492MAB	9/19/2002	M	5201652	N	(*)	9/24/2002	Q		QWEST ADDED DISCO AS UNIT, NOT ORDERED.	
UT223636SMM	9/26/2002	M	5248571	N	(*)	9/30/2002	Q		QWEST TYPED GVT ON A 1FB LINE BUT IT IS NOT AVAILABLE.	
MN222724JMG	9/24/2002	M	5230369	N	(*)	9/27/2002	Q		LINE 0633 REMOVE BUT NOT REQUESTED.	
CNM218479JMG	9/24/2002	M	5225713	N	(*)	9/25/2002	Q		QWEST ADDED GVS ON HT 6919, THIS WAS NOT REQUESTED.	
AZ224474EGMS VER 1	9/27/2002	R	5256579	N	(*)	10/2/2002	Q	N	1497198 MARTHA FIXED/MISSING FID TBE A	149198
WA222510CDO	9/27/2002	M	5240778	N	(*)	10/3/2002	Q	N	1497940 MISSED 1 LINE TO ADD 69H	1497940
CO221838MAB VER 1	9/25/2002	M	5237970	N	(*)	9/30/2002	Q	N	DID NOT PUT 0391 DISCO ON PSON	

Received During
9/28/02 – 10/4/02

QWEST SERVICE ORDER ERRORS:
PSONS (for Off-Net Orders)¹

% Off-Net Orders Indicating Non-Flow Through ("NFT") on FOC: 77%²

COMPARISON OF ISRs (i.e., NFT CONFIRMATIONS) v. NFT PSONS:

Off-Net Order Type	Incomplete PSON's ³ (Excluded)	Duplicate PSON's (Excluded) ⁴	Total PSONS (Minus Exclusions)	Total PSON's with 1 or More Qwest Errors	% of Qwest Errors on Non Flow Through Service Orders
Conversions	0	3	48	10	21%
MACs	1	1	128	12	9%
DSL	0	0	27	0	0%

¹ These data are for Off-Net orders. Off-Net includes UNE-P orders and orders placed using resale process (i.e., "UNE-E"). For on-net (i.e., loops to be used with Eschelon's switch) orders, Qwest is providing incomplete data for a large number of PSONS, making comparison impossible. For on-net orders, incomplete information is mainly found in the Eastern and Western Qwest billing regions.

² Total Off-Net orders (NFT and flow through) = 263

³ Although incomplete PSONS are a greater problem of On-Net order, some Off-Net PSONS are incomplete and incomplete PSONS affecting the analysis are excluded. For example, a PSON with no Service and Equipment section is excluded.

⁴ Qwest is providing duplicate PSONS in some cases for individual orders. Although generally there appear to be no changes in the PSONS, Qwest indicated "Y" for the Order Change Indicator field. For these duplicate PSONS, Eschelon has not initiated activity that would result in a new PSON. Therefore, Qwest appears to be generating the PSONS, though it is unclear whether the PSONS are inadvertent duplicates or actually reflect corrective action.

RECEIVED DURING
9130102 - 10104102
PWEST SERVICE ORDER ERROR DETAIL
OFF-NET PSONS

Redacted--For Public Inspection

PON	PSON RECEIVED DATE	MAC (M), Resale conversion. (R)	LSR ID	FLOW THROUGH Y/N	Customer TN	DD	Qwest Error (Q)	Order Chg Indicator Y/N	What were the errors	Qwest Escalation Ticket
UT224202EGMS	9/30/2002	R	5262647	N	(*)	10/3/2002	Q	N	1498577-KATHY FIXED IT /MISSING FID	1498577
MN224696JMG	10/1/2002	M	5268798	N	(*)	10/3/2002	Q		PSON SHOWS LINE BEING A MOVE	1500188
WA225101GMS	9/30/2002	R	5265900	N	(*)	10/10/2002	Q	N	1498807 CARRIE FIXED / MISSING 2 FIDS	1498807
MN224782MAB	9/30/2002	M	5259163	N	(*)	10/3/2002	Q	N	1498736//QWEST TOOK OFF RTVXN -- NOT ON ORDER	1498736
CO224863MAB	9/30/2002	M	5262391	N	(*)	10/4/2002	Q	N	MISSED FBJ AND FVJ ON ORDER	
AZ225223GMS	10/1/2002	R	5266652	N	(*)	10/14/2002	Q	N	ADDED ESM ON -8887 NOT ORDERED	
OR221053GMS	9/30/2002	R	5262209	N	(*)	10/14/2002	Q	N	1499363 WRONG PICS ON LINE 3	1499363
CO222811GMS VER 2	10/1/2002	R	5242263	N	(*)	10/8/2002	Q	N	149977 FID MISSING ON LINE 5783 :HTG A	1499977
UT223323GMS	10/2/2002	R	5279557	N	(*)	10/10/2002	Q	N	1502564 3 RTVXN ON 0220	1502564
AZ225020GMS	10/3/2002	R	5285492	N	(*)	10/16/2002	Q	N	TBE A MISSING	
UT225856GMS	10/3/2002	R	5286484	N	(*)	10/16/2002	Q	N	ORDER CONF - DISCONNECTING DTLBX - NOT SHOWN ON PSON	
WA224248CDO VER 2	10/3/2002	M	5283850	N	(*)	10/8/2002	Q	N	QWEST DID NOT CHG TN PER REQUEST	
AZ225054CDO VER 1	10/3/2002	M	5291652	N	(*)	10/10/2002	Q	Y	1504167 DOES NOT SHOW THE LINES CONVERTED	
AZ226222MAB	101212002	M	5277741	N	(*)	10/7/2002	Q	Y	1502580 QWEST IS REMOVING RTVXN IMA ORDER NOT REQUEST CHANGE	1502580
CO224623MAB	101212002	M	5272894	N	(*)	10/7/2002	Q	Y	1501954 CORRECTED PSON	1501954
WA224248CDO VER 2	101412002	M	5283850	N	(*)	101812002	Q	N	1505449 2ND TICKET QWEST DID NUMBER PREFIX	1505449
AZ225054CDO VER 1	101412002	M	5291652	N	(*)	1011012002	Q	Y	1505445 NO FEATURES ON 480726 7268	1505445
AZ222365-1MAB	101412002	M	5294015	N	(*)	101812002	Q	N	1504559 DIDN'T PUT HTG FIDS ON 2 LINES	1504559
CO224623MAB	101212002	M	5272894	N	(*)	10/7/2002	Q	N	1501954 QWEST LEFT OFF HTG 69J -69H WRONG CFN	1501954
CO223091MAB	101212002	M	5277939	N	(*)	101812002	Q	N	1502046 AYK DID NOT REQUEST IT	1502046
CO226391JGS	101312002	R	5290863	N	(*)	101512002	Q	N	1506981 QWEST PUT FBJ ON THE ORDER - OPENED TICKET TO REMOVE IT	1506981
CO221459JYK	101112002	R	5257401	N	(*)	101112002	Q	N	QWEST PLACE RTVXQ INSTEAD OF RTVXN CORRECTED ON ESC TICKET 1502800	1502800

(*) Confidential customer identifying information redacted.

0000032

September Qwest Error Escalation Examples: Do Not Appear To Be Captured in OP-5

≤ 72 hours with no Qwest History

RECEIVED TIME	SERV CLASS	GB	TICKET #	OOS	TRBL REPORTED	TROUBLE FOUND/WORK DONE
9/3/02 8:58	OFF NET	SALT-LAKE-W	2002090300082884 *	Y	ALL LNS RINGING DISCO	QWEST-LNS BROUGHT DOWN WHEN CONVERTING, ESC TKT 1467589, LNS BACK UP, TWO LNS BEING INSTALLED LATER TODAY
9/4/02 17:12	OFF NET	SALT-LAKE-H	2002090400083340 *	N	HUNTING NOT WORKING	QWEST HUNTING WAS NOT PROGRAMMED
9/6/02 8:50	OFF NET	DENVER MAIN	2002090600083619 *	Y	NDT DISC RECORDING	QWEST ESC TKT 1472507 LINE NOT PROGRAMMED IN
9/6/02 14:32	OFF NET	PHOENIX-HUB	2002090600083748	N	HUNTING NOT WORKING	QWEST DIDN'T HAVE HUNTING ON ORDER
9/9/02 15:51	OFF NET	MPLS - HOST	2002090900084108	N	HUNTING NOT WORKING	QWEST MISSED HUNTING ON ORIGINAL CONVERSION ORDER 9/4/02 - CORRECTED ON ESCALATION TICKET 1475239
9/19/02 15:48	ON NET	DRY CREEK	2002091900086106 *	N	VM STILL GOING TO QWEST BOX AND S	QWEST HAD PORTED # BUT DIDNT REMOVE THEM FROM SWITCH
9/20/02 15:12	OFF NET	PHOENIX-HUB	2002092000086316 *	Y	NDT ALL LINES - WENT OUT 30 MINS AG	QWEST DISCOD IN ERROR INTERCONNECT TKT 1489096
9/20/02 17:59	ON NET	MESA	2002092000086362 *	N	SOME CALLS STILL GOING TO OLD QWE	INTERCONNECT TKT # 1489297 QWEST HAD # BUILT IN OLD SWITCH AFTER CONVERSION
9/24/02 11:07	OFF NET	VANCOUVER	2002092400086712 *	N	MAIN LN RINGING DISCO	QWEST-LN WENT DOWN THIS MORNING WHILE CONVERTING, ESC TKT # 1491500, RCMAC CLD, LN PROGRAMMED BACK IN
9/24/02 12:04	OFF NET	PORTLAND-HU	2002092400086730	N	LIDB/CNAM	QWEST--QWEST LINE RECORD DID NOT MATCH OUR ORDER
9/24/02 14:58	OFF NET	PHOENIX-HUB	2002092400086778	N	CANT DIAL LD FROM FAX LINE	QWEST-PICS MISSED ON ORIGINAL CONVERSION ORDER. ESC TKT #1492340. PICS CORRECTED, LD WORKING.
9/25/02 8:53	OFF NET	DENVER-HOST	2002092500086871 *	N	CALLS STILL FWD TO OLD VM	QWEST-CUT THIS MORNING, CFDA/BL WAS STILL GOING TO OLD VM. ESC TKT # 1492881. TESTED, FWD NOW GOING TO OUR VM.
9/25/02 13:58	OFF NET	VANCOUVER	2002092500086995	N	CALL FORWARD DON'T ANSWER FEATU	QWEST-ORDER TYPIST IS TO DETERMINE IF CFN REQUIRES 1, TYPED W/O 1+. ESC TKT #1495787, ORDER C00430157 CORRECTED
9/25/02 14:30	OFF NET	DENVER-HOST	2002092500087015	N	CBC/RNA WHEN CALLED	QWEST TICKET# 1494330, QWEST ISSUED THIS # TO ONE OF THEIR RETAIL CUSTOMERS
9/25/02 16:00	ON NET	MESA	2002092500087047 *	N	NDT/CBC	QWEST BROUGHT DOWN LINE DUE TO CONVERSION ORDER PUSH OUT - RESTORED SERVICE ON ESCALATION TICKET 1494189
9/26/02 11:11	OFF NET	MPLS - HOST	2002092600087125 *	N	MSG WAIT AUDIO IS NOT WORKING	QWEST DIDNT HAVE FEAT. PROGRAMMED
9/30/02 8:47	OFF NET	DENVER-HOST	2002093000087511 *	N	CBC ALL LINES EXCEPT 3036992233	QWEST BROUGHT LINES DOWN AT CONVERSION TIME - SERVICE RESTORED ON ESCALATION TICKET 1497955
9/30/02 8:53	OFF NET	PHOENIX-HUB	2002093000087512 *	N	NDT DISK	QWEST 1497992

72 hours with Qwest History, but are Escalation Tickets

ECEIVED TIME	SERV CLASS	GB	TICKET #	OOS	TRBL REPORTED	TROUBLE FOUND/WORK DONE
9/5/02 12:22	OFF NET	PHOENIX-HUB	2002090500083440 *	N	CBC - ALL LINES - OUTGOING OK	QWEST HAD LNP'D # INCORRECTLY
9/10/02 15:48	OFF NET	DENVER-HOST	2002091000084437	N	NDT - CALLERS GET DISCO MESSAGE	QWEST ESCALATION TICKET 1477934 - BROKEN X-CONNECT REPAIRED.
9/13/02 9:33	OFF NET	MPLS - HOST	2002091300084965 *	N	CBC ALL LINES	QWEST ESC TKT 1480400 AND REPAIR TKT 0178102
9/16/02 14:01	OFF NET	SEATTLE-HUB	2002091600085310 *	N	LD NOT WORKING RCVD CCB CMP AS DI	QWEST TKT DIAL LOCK NOT REMOVED FROM LINE
9/16/02 16:47	OFF NET	PARKCITY	2002091600085379 *	N	AYK, NNK, ESX, NWT NOT WORKING	QWEST-AYK, NNK, NWT, ESX ALL ORDERED CORRECTLY, NONE PROGRAMMED. CLD REPAIR, REP PROGRAMMED FEATURES WHILE I WAS ON LN
9/17/02 15:42	OFF NET	MPLS - HOST	2002091700085612 *	N	LINES ARE NOT HUNTING	QWEST TRANSLATIONS MISSED HUNTING ON CONVERISON ORDER
9/20/02 9:15	OFF NET	DENVER MAIN	2002092000086178	N	ALL LNS DOWN	QWEST-ORDERS HAD BEEN CANCELLED, D ORDER WORKED ANYWAY, ESC TX 1488002, 1488177. SEE COMMENTS
9/24/02 11:05	OFF NET	SEATTLE-HUB	2002092400086710 *	N	CBC	QWEST TKT 0279072 AND 3606664662 -- TECH CORRECT TRUNK GROUP FAILURE MEMBER 360 THRU 407 -- FIXED
9/24/02 15:28	OFF NET	PHOENIX-HUB	2002092400086786 *	N	HNTING NOT WORKING	QWEST TKT 4802187779 HNTING NOT PROGRAMMED
9/25/02 15:04	OFF NET	SEATTLE-HUB	2002092500087025 *	N	CBC - GET BUSY - NOT VM	QWEST - REPROGRAMMED HUNT SEQUENCE FOR CUSTOMER.

ote . The asterisk is an indicator of a switch translations error.

OOS = Out of Service

-----Original Message-----

From: Vanessa Meiland [SMTP:vheilan@qwest.com]

Sent: Tuesday, October 08, 2002 12:00 PM

To: Roney, Cynthia M.

Cc: 'csiewer@qwest.com'; 'jlnovak@qwest.com'; Stanczyk, Maleta M.;
Patricia Levene; Jeffrey W Tietz

Subject: Re: FW: Pending Service Order Notice PON:
UNEPUT1MMS228219 VER:

Cindy,

The LSR was sent less than 2 hours ago today. Flowthrough created the order that your provisioner is looking at. Flowthrough is not creating perfect orders at this time as we are all well aware. It will be a process issue as to how much time Qwest will have to identify flowthrough order issues and correct them. I have taken care of this order.

Venessa

1000034

Exhibit 34

DATE	PON	TICKET TYPE	FST	TEST/REASON FOR TICKET	EST. ACMP. DATE
9/11/2002	AZ213516IDSL	SC431026	Bill	synch/no surf, Q will test and call w/results	37510
9/11/2002	AZ216722DSLF	#6022243532	Nick	locate and tag BP, Advise demarc location	37512
9/16/2002	AZ215272DSLF	#4809511763	Nick	locate and tag BP, Advise demarc location	37515
9/17/2002	AZ213516IDSL	SC440142IDSL	"	synch/no surf, Q will test and call w/results	37517
9/20/2002	AZ216722DSLF	MB297935	Nick	synch/no surf, Q will test and call w/results	37519
10/1/2002	AZ216768IDSL	unknown	Nick	synch/no surf, Q will test and call w/results	37530
9/3/2002	CO210789IDSL	CD550373	Paul	Bill	37504
9/4/2002	CO212216IDSLF	MB287971	Paul	no surf or authentication	37504
9/11/2002	CO210789IDSL	CD551921	Bill	no link, Q to test and call back w/results	37504
9/11/2002	CO210789IDSL	CD558304	"	"	37512
9/12/2002	CO213575DSLF	#72022834073	Paul	vendor meet, check for transmission of data	37511
9/17/2002	CO217448DSLF	MB285595	Paul	no link, Q to test and call back w/results	37517
9/19/2002	CO206541DSLF	MB297170	Paul	no dial tone at BP	37519
9/23/2002	CO216883IDSL	CD569364	Paul	Vendor meet 9/20 8-noon	37519
9/24/2002	CO217237IDSL	CD570756	Paul	locate and tag BP	37523
9/25/2002	CO217237IDSL	CD571285	Paul	Vendor meet 9/26	37525
9/26/2002	CO217237IDSL	CD570756	Paul	Vendor meet 10/2 @ 8AM	37531
9/27/2002	CO220946DSLF	#3032932162	Paul	locate and tag BP	37529
9/27/2002	CO220946DSLF	#3032932162	Paul	no link, Q to test and call back w/results	37526
9/4/2002	MN213799DSLF	#61263239285	Dale	tag and locate-Q to call when closed	37503
9/9/2002	MN21352DSLF	EB112818	Richard	no dial tone at binding post	37508
9/13/2002	MN205644DSLC	EB114555	Richard	no link, Q to test/dispatch and call w/results	37516
9/18/2002	MN213722DSLC	EB115207	Richard	no link, Q to test/dispatch and call w/results	37517
9/19/2002	MN218127DSLF	#9528883402	Richard	tag and locate-Q to call when closed	37519
9/20/2002	MN218127DSLF	#9528883402	Richard	move line to west wing demarc	37520
9/25/2002	MN220601DSLF	#1493228	Paul	NO VP/VC info	37524
9/25/2002	MN220123DSLF	#6516865337	Dale	locate and tag at binding post	37525
9/26/2002	MN218145IDSL	DE434939	Dale	locate and tag at binding post	37526
10/1/2002	MN221538DSLF	#6519170102	Richard	locate and tag at binding post	37530
10/2/2002	MN220508DSLF	EB118205	Dale	synch, no surf, Q to dipatch and test w/nt	37532
9/6/2002	OR211359IDSL	WS519849	Bill	synch/no surf-Q to test and dispatch, call back	37505
9/23/2002	OR217492DSLF	#5033642924	Todd	locate and tag - NDT	37522
9/26/2002	OR211359IDSL	WS539255	FRED	LMI errors	37526
9/3/2002	UT209687IDSL	SC416976	"	synch, no surf, Q to test and call w/results	37502
9/10/2002	UT2309301IDSL	SC417045	"	no link, Q will test/call with results	37503
9/10/2002	UT213009IDSL	SC428795	"	no link, Q will test/call with results	37509
9/19/2002	UT215816IDSL	SC443202	"	loop delivered to wrong bldg-doing vendor meet	37522
9/20/2002	UT216720IDSL	SC444426	DAVID	LINE SURFS BUT TIMES OUT RIGHT AWAY	37519
9/24/2002	UT216720IDSL	SC448574	DAVID	no surf at all now, set up vendor meet w/qwest	37523
9/3/2002	WA187700IDSL	WS516773	Bill	synch/no surf, Q to test and dispatch, and call	37503
9/10/2002	WA213063DSLF	BP151874	Jay	Pat	37504
9/10/2002	WA214432DSLF	#4254531497	Jay	tag and locate, no loop identified	37509
9/11/2002	WA208057IDSL	WS525101	Bill	synch/no surf, Q to test and dispatch, and call	37511
9/16/2002	WA208057IDSL	WS529130	"	"	37512
10/1/2002	WA214139DSLF	#2532724972	Jay	tag and locate, no loop identified	37530
10/2/2002	WA220888DSLF	#4254542579	Jay	tag and locate, no loop identified	37531
9/3/2002	UT209687IDSL	SC416976	"	synch, no surf, Q to test and call w/results	37502
9/10/2002	UT2309301IDSL	SC417045	"	no link, Q will test/call with results	37503
9/19/2002	UT215816IDSL	SC443202	"	loop delivered to wrong bldg-doing vendor meet	37522
9/20/2002	UT216720IDSL	SC444426	DAVID	LINE SURFS BUT TIMES OUT RIGHT AWAY	37519
9/24/2002	UT216720IDSL	SC448574	DAVID	no surf at all now, set up vendor meet w/qwest	37523
9/3/2002	WA187700IDSL	WS516773	Bill	synch/no surf, Q to test and dispatch, and call	37503
9/10/2002	WA213063DSLF	BP151874	Jay	Pat	37504
9/10/2002	WA214432DSLF	#4254531497	Jay	tag and locate, no loop identified	37509
9/11/2002	WA208057IDSL	WS525101	Bill	synch/no surf, Q to test and dispatch, and call	37511
9/16/2002	WA208057IDSL	WS529130	"	"	37512
10/1/2002	WA214139DSLF	#2532724972	Jay	tag and locate, no loop identified	37530
10/2/2002	WA220888DSLF	#4254542579	Jay	tag and locate, no loop identified	37531

100003

37511					
37512					
37515					
37517	Total Reach system				
37519					
37530					
37531	LMI issues				

DSL Terminology

Synch/no surf, Qwest will test and call w/results

Synch/no surf means Eschelon has land connection but is unable to surf the net. This issue is usually due to a bad card (Eschelon's or Qwest's) or a wiring problem in the central office. The resolution to this issue is it to keep the Eschelon FST on site to work with Qwest IP tech support.

No link-Qwest to test, call with results

The FST identifies that the loop is not working for various reasons at the customer site: The Tester will open a repair ticket with Qwest. The central office is checked for wiring problems and a Qwest tech is dispatched if needed.

No dial tone on site

The FST has located the loop but has no dial tone. The tester will open a repair ticket with Qwest. The central office is checked for wiring problems and a Qwest tech is dispatched if needed.

Locate and tag BP. Advise demarc location

FST on site is unable to locate the line at the demarc. A repair ticket is opened with Qwest requesting a tag & label. These tickets identify the following issues: wrong address on order, wrong demarc. incorrect tag on demarc, no tag at all. The Qwest tech is re-dispatched to the site to tag and label. Once the Qwest ticket is closed, Eschelon will re-dispatch the FST. If the line is still not located a second ticket is opened for a vendor meet.

Cannot train

The line is identified on site but is not working. The issues could be line conditioning, loop length or a bad card. Open a repair ticket with Qwest.

No VPI / VCI info

No VPI/VCI information in QHOST. Eschelon engineering cannot do its part without this information. A ticket is opened with Qwest for resolution. This issue has the potential to delay the order as much as two weeks depending on FST availability.

Line delivered **to** wrong demarc

FST identifies that the loop is not at the correct demarc. A repair ticket is opened with Qwest to move the line.

Open in the CO, Qwest to test and call back

This is an issue with IDSL orders. The loop has not been connected or has been connected incorrectly in the central office. Eschelon testers are able to identify this issue by running a line test through Eschelon's switch. A repair ticket is opened with Qwest and the loop is checked in the central office.

DSL Combo orders.

Qwest is working the disconnects before turning up the lines. This causes customer outages. Work with Qwest in Test and Turn up to re-establish the customers existing DSL or expedite the turn up of the new order.

Wrong circuit type on **LSRC**

Eschelon receives ISRC's with UBCU when they should be AGFU as the circuit identifiers. The resolution to this is to call Qwest and verify that the correct circuit has been typed on the order.

COMBO Order submitted **to** Qwest but never worked the translations.

Eschelon receives the LSRC and PSON with the correct information. When Eschelon receives the completion notice and it states "No Service and Equipment available" then Qwest has not worked the order in translations. This results in an escalation ticket. Currently provisioning will look for these completion notices and bring them immediately to the attention of the tester in order to resolve the problem as soon as possible. Need a way to identify these issues before they happen. Qwest should develop a process created to check DSLC orders the morning before the conversion.

**CUMULATIVE
REPORTING DATES
9/08/02 - 9/14/02
9/23/02 - 10/05/02
DESIGN TICKETS CODE NO TROUBLE FOUND(NTF) BY QWEST BUT ESCHOLON'S RECORD SHOWS QWEST TROUBLE**

STATE				
TOTAL TICKETS	CODNED NTF BY	% OF TICKETS CODNED	TOTAL TICKETS CODNED NTF FOR WHICH	
ESCHOLON CITED	QWEST FOR WHICH	NTF BY QWEST FOR	ESCHOLON CITED QWEST TROUBLE	
TOTAL DESIGN TICKETS	ESCHOLON CITED	WHICH ESCHOLON CITED	WITH CEMR HISTORY SHOWING BILLING	
CODNED NTF BY QWEST	QWEST TROUBLE	QWEST TROUBLE	Y'	
AZ	30	8	27%	5
CO	25	8	32%	6
MN	23	4	17%	1
OR	6	0	0	0
UT	20	14	70%	1
WA	6	4	67%	4
ALL	110	38	34%	17
1: For tickets entered using CEMR, closing email indicates whether a charge will be billed (but not an amount)				
For other tickets (called in) CEMR history uses phrases such as "test ok, billed correctly" which				
appears to indicate there will be a charge.				

REPORTING PERIOD

9/08/02 - 9/13/02

DESIGN TICKETS CODED NO TROUBLE FOUND (NTF) BY QWEST BUT ESCHOLON RECORD SHOWS QWEST TROUBLE

STATE	TOTAL DESIGN TICKETS CODED NTF BY QWEST	TOTAL TICKETS CODED NTF BY QWEST FOR WHICH ESCHOLON CITED QWEST TROUBLE	% OF TICKET CODED NTF BY QWEST FOR WHICH ESCHOLON CITED QWEST TROUBLE	TOTAL TICKETS CODED NTF FOR WHICH ESCHOLON CITED QWEST TROUBLE WITH CEMR HISTORY SHOWING BILLING -Y'
AZ	8	2	25%	2
CO	13	6	46%	5
MN	11	2	18%	1
OR	4	0	0	0
UT	14	11	78%	0
WA	0		0	0
ALL	50	21	42%	8
1: For tickets entered using CEMR, closing email indicates whether a charge will be billed (but not an amount)				
For other tickets (called in) CEMR history uses phrases such as "test ok, billed correctly" which				
appears to indicate there will be a charge				

CENTR																
COMPLETION			HISTORY													
STATE	PROD CD	DATE	REC	DT	TM	QWEST	TICKET	CAC	NTR	LOCA	LOCZ	TRBL	ESCHELON	DISPUT	INDICATES	BILLING
												CODE	TICKET	EYN		YN
AZ	UBL 2W ANL	11-Sep-02	9/7/2002	9:15		SC432933		SRK4LB9	1:42	TEMPAZMA	TEMPAZMA	NTF	83797	0005	Y	QWEST WAS DISPATCHED - BUT ISSUE CAME CLEAR AFTER
AZ	UBL 2W ANL	11-Sep-02	9/9/2002	11:24		SC427544		STE4EU8	1:34	PHNXAZNO	PHNXAZNO	NTF	84021	0004	Y	QWEST REPLACED - BUGGS IN CO -
AZ	UBL 2W ANL	11-Sep-02	9/7/2002	8:47		SC423896		STH4NG6	0:44	PHNXAZMA	PHNXAZMA	NTF	83776		N	
AZ	UBL 2W ANL	11-Sep-02	9/9/2002	13:30		SC427358		SSD4AN8	0:13	PHNXAZNO	PHNXAZNO	NTF	84080		N	
AZ	UBL 2W ANL	12-Sep-02	9/10/2002	13:24		SC429746		9PZ4HR8	0:27	MESAAZMA	MESAAZMA	NTF	84792		N	
AZ	UBL 2W ANL	13-Sep-02	9/11/2002	20:37		SC432600		SYA4QR4	0:05	PHNXAZCA	PHNXAZCA	NTF				ACCESS CARE
AZ	UBL 2W ANL	13-Sep-02	9/12/2002	11:45		SC433841		SQD4RM9	2:00	PHNXAZNO	PHNXAZNO	NTF	84792		N	TICKET NOT FOUND
AZ	UBL XDSL	12-Sep-02	9/11/2002	7:45		SC431026		SWP4LE8	3:16	MESAAZMA	MESAAZMA	NTF				ACCESS CARE
CO	UBL 2W ANL	9-Sep-02	9/5/2002	13:19		CD532815		SWM4CW7	1:35	LKWDCCOMA	LKWDCCOEPK03	NTF	83371		N	TICKET NOT FOUND
CO	UBL 2W ANL	9-Sep-02	9/5/2002	13:30		CD552854		SWM4CW7	1:27	LKWDCCOMA	LKWDCCOMAH04	NTF	83422	0002	Y	ADDP TICKET CD553821 OPENED, FOUND PAIR MOVED TO WRONG BINDING POST -
CO	UBL 2W ANL	9-Sep-02	9/5/2002	15:26		CD553012		SUP4HQ4	0:52	ARVDCOMA	ARVDCOMA	NTF	83374		N	ESCH TECH REPORTED NDT AT DEMARC - LINE TEST SHOWED TROUBLE - QWEST REPORTED NTF BUT TROUBLE CLEARED - N76
CO	UBL 2W ANL	9-Sep-02	9/5/2002	16:09		CD553054		STN4YE6	0:12	DNVRCOSA	DNVRCOSA	NTF	83551	0002	Y	
CO	UBL 2W ANL	9-Sep-02	9/5/2002	18:47		CD553147		SWJ4PW9	2:56	LKWDCCOMA	LKWDCCOEPK02	NTF	82974		N	
CO	UBL 2W ANL	9-Sep-02	9/6/2002	9:10		CD553402		SUP4D13	0:41	ARVDCOMA	ARVDCOMA	NTF	83374		N	
CO	UBL 2W ANL	9-Sep-02	9/6/2002	9:13		CD553407		SUP4HR4	0:16	ARVDCOMA	ARVDCOMA	NTF	83374		N	
CO	UBL 2W ANL	9-Sep-02	9/6/2002	13:13		CD553887		SWM4KR5	0:19	ENWDCOMA	ENWDCOMA	NTF	82566		N	
CO	UBL 2W ANL	11-Sep-02	9/9/2002	16:42		CD556601		SVS4LB6	2:18	AURRCOMA	AURRCOMA	NTF	84076	0002	Y	BAD COIL IN CO PAIR MOVED AT BINDING POST ACCESS CARE
CO	UBL 2W ANL	12-Sep-02	9/10/2002	14:35		CD557608		SVH4CZ6	1:16	LKWDCCOMA	LKWDCCOMAH04	NTF	83422	0002	Y	TICKET NOT FOUND
CO	UBL 2W ANL	13-Sep-02	9/10/2002	16:18		CD557704		STM4HJ7	0:11	BLDRCOMA	BLDRCOMA	NTF				
CO	UBL 2W ANL	12-Sep-02	9/10/2002	20:48		CD557823		SVL4VJ5	1:48	DNVRCOCH	DNVRCOCH	NTF	83500	0002	Y	BAD UDC CARD
CO	UBL 2W ANL	12-Sep-02	9/11/2002	8:49		CD558016		SVT4CF8	1:07	DNVRCOSE	DNVRCOSE	NTF	83500	0002	Y	BAD UDC CARD ACCESS CARE
MIN	DSL	13-Sep-02	9/11/2002	12:59		DE408666		SHY3VM7	0:01	NVBTMNCNCLHG5	FRDLNFR	NTF				TICKE T NOT FOUND
MIN	UBL 2W ANL	9-Sep-02	9/4/2002	12:24		DE92761		SNB3BT2	0:40	STPLMNMK	STPLMNMK	NTF	83234		N	
MIN	UBL 2W ANL	9-Sep-02	9/5/2002	16:53		DE96212		SLP3QP8	3:52	EAGNMLB	EAGNMLB	NTF	83380		N	
MIN	UBL 2W ANL	11-Sep-02	9/6/2002	15:35		DE400129		SNM4SE9	1:10	MPLSMNDT	MPLSMNDT	NTF			N	
MIN	UBL 2W ANL	10-Sep-02	9/6/2002	16:18		DE400368		SLJ3ZAJ	0:50	HPKNMNHQ	HPKNMNHQ	NTF	83690		N	
MIN	UBL 2W ANL	9-Sep-02	9/7/2002	9:02		DE401215		SLH3KN3	1:06	STPLMNMK	STPLMNMK	NTF	83825		N	
MIN	UBL 2W ANL	11-Sep-02	9/10/2002	8:57		DE405788		SHB3DF9	1:26	HPKNMNHQ	HPKNMNHQ	NTF	84182		N	ACCESS CARE
MIN	UBL 2W ANL	12-Sep-02	9/10/2002	22:08		DE407476		SLH3KN2	0:16	STPLMNMK	STPLMNMK	NTF				TICKE T NOT FOUND
	UBL 2W ANL	11-Sep-02	9/11/2002	8:38		DE407839		SFR3HZ3	0:45	GLVYMNOR	GLVYMNOR	NTF	84441	0002	Y	TICKET DE411673 REOPEN THIS ISSUE
MIN	UBL 2W ANL	13-Sep-02	9/12/2002	0:07		DE409455		SFD3VM4	14:52	MPLSMNBE	MPLSMNBE	NTF	84629	0002	Y	QWEST REPORTED NTF BUT PROBLEM CLEAR WHEN QWEST WAS DISPATCHED
MIN	UBL 2W ANL	13-Sep-02	9/12/2002	10:11		DE409916		SHJ3DA3	0:07	GLVYMNOR	GLVYMNOR	NTF	84661		N	
OR	LIS TRUNK	13-Sep-02	9/12/2002	13:12		DW411859		MAB3AW2	1:31	PTLDOR1350T	PTLDOR69HG3	NTF	84816		N	
OR	UBL 2W ANL	8-Sep-02	9/7/2002	7:20		WS520948		SIG3WB3	1:19	PTLDOR69	PTLDOR69	NTF	83701		N	

OR	UBL 2W ANL	13-Sep-02	9/13/2002 11:15	WS527022	SKC3VR7	0.28	PTLDOR11	PTLDORWFK03	NTF	85019		N		
OR	UBL 2W ANL	13-Sep-02	9/13/2002 11:17	WS527026	SKC3VR6	0.26	PTLDOR11	PTLDORWFK03	NTF	85019		N		
UT	UBL 2W ANL	13-Sep-02	9/6/2002 21:30	SC423130	SVY4AQ8	1.39	CTWDUTMA	CTWDUTMA	NTF	83695		N		
UT	UBL 2W ANL	12-Sep-02	9/9/2002 14:03	SC427722	SUE4JQ5	0.14	CTWDUTMA	CTWDUTMA	NTF	83955		N		
UT	UBL 2W ANL	13-Sep-02	9/10/2002 12:51	SC429578	SUE4JQ5	1.03	CTWDUTMA	CTWDUTMA	NTF	83955		N		
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 11:48	SC431854	SVA4GB1	0.39	MDVAUTMA	#NAME?	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 11:52	SC431860	SVA4GB8	0.34	MDVAUTMA	MDVAUTMA	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 11:54	SC431870	SVA4GB2	0.32	MDVAUTMA	MDVAUTMA	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 11:56	SC431873	SVA4GB4	0.30	MDVAUTMA	MDVAUTMAHAS	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 11:57	SC431881	SVA4GB9	0.26	MDVAUTMA	MDVAUTMA	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 11:59	SC431885	SVA4GC2	0.27	MDVAUTMA	MDVAUTMA	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 12:01	SC431894	SVA4GA8	0.25	MDVAUTMA	MDVAUTMA	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 12:03	SC431899	SVA4GA7	0.23	MDVAUTMA	MDVAUTMA	NTF	83951	0002	Y	N	
														ALL LINES CHG TO PAIR GAIN RELATED QWEST TICKET 431847
UT	UBL 2W ANL	13-Sep-02	9/11/2002 12:05	SC431902	SVA4GB5	0.21	MDVAUTMA	MDVAUTMA	NTF	83951	0002	Y	N	
														DEFFECTIVE F2 PAIR
UT	UBL 2W ANL	13-Sep-02	9/11/2002 12:06	SC432108	SVA4GB6	0.20	MDVAUTMA	MDVAUTMA	NTF	84556	0002	Y	N	
UT	UBL 2W ANL	13-Sep-02	9/11/2002 14:35	SC433653	SSD4UT3	0.52	MDVAUTMA	MDVAUTMA	NTF	84725	0001	Y	N	WRONG CP IN CO

1000040

REPORTING PERIOD

9/23/02 9/28/02

DESIGN TICKETS CODED NO TROUBLE FOUND (NTF) BY QWEST BUT ESCHOLON RECORD SHOWS QWEST TROUBLE

STATE	TOTAL DESIGN TICKETS CODED NTF BY QWEST	TOTAL TICKETS CODED NTF BY QWEST FOR WHICH ESCHELON CITED QWEST TROUBLE	% OF TICKETS CODED NTF BY QWEST FOR WHICH ESCHOLON CITED QWEST TROUBLE	TOTAL TICKETS CODED NTF FOR WHICH ESCHOLON CITED QWEST TROUBLE WITH CEMR HISTORY SHOWING BILLING- Y ¹
AZ	4	1	25%	1
CO	8	1	12%	1
MN	71	71	28%	n
UT	5	2	40%	0
ALL	30	10	33%	6
1: For tickets entered using CEMR, closing email indicates whether a charge will be billed (but not an amount; For other tickets (called in) CEMR history uses phrases such as "test ok billed correctly", which appears to indicate there will be a charge.				

Weekly Repair Tickets for A07 Design 9-23-02 TO 9-28-02															
ST	PROD_CD	COMP DATE	REC_DT	REC_TM	QWEST TICKET#	CAC	MTTR	LOCA	LOCZ	TRBL CODE	ESCHELON TICKET	ESCHELON DISP CODE	DISPUTE Y/N	CEMR INDICATES BILLING Y/N	REMARKS
AZ	UBL 2W ANL	23 Sep-02	21 Sep-02	8:23	SC445458	SRY4YC8	6:59	PHNXAZCA	PHNXAZCA	NTF	86358	0002	Y	Y	QWEST REPLACE t2 PAIR
CO	UBL 2W ANL	25 Sep-02	23 Sep-02	9:45	CD569408	SWQ4YC8	2:59	DNVRCOSE	DNVRCOSE	NTF	86426	0001	Y	Y	RELATED TICKET CD569404
MN	UDIT_DS1	22-Sep-02	22-Sep-02	11:11	DE426812	SLQ3GU8	2:08	STPLMNMHGH4	STPLMNHGH6	NTF	86404	0002	Y		CEMR HISTORY UNABLE TO DETERMINE IS QWEST WILL BILL
UT	UBL 2W ANL	24-Sep-02	23-Sep-02	8:10	SC446988	SUV4GQ3	0:13	MRRYUTMA	MRRYUTMA	NTF	86340	0004	Y	N	BAD F1, BRIDGE TAPS REMOVE TICKET ESCALATED TO JEAN NOVAK & PAT LAVINE
UT	UBL_DS1	24-Sep-02	22-Sep-02	7:33	SC445988	SWP4VG7	1:56	MDVAUTMAHGE	MDVAUTMA	NTF	86406	T1T2	Y		CAN NOT FIND CEMR HISTORY UNABLE TO DETERMINE IS QWEST WILL BILL
WA	UBL 2W ANL	25-Sep-02	23-Sep-02	21:38	WS536806	SKA3HC6	5:08	STTLWACH	STTLWACH	NTF	86600	0002	Y	Y	QWEST FIXED THEIR CO OPEN IN THE CROSS BOX
WA	UBL 2W ANL	27-Sep-02	24-Sep-02	7:16	WS536951	SGK3KH8	0:41	KENTWA01	KENTWA01	NTF	85662	0002	Y	Y	QWEST FOUND BAD UDC FIELD UNITS
WA	UBL 2W ANL	27-Sep-02	24-Sep-02	7:21	WS536953	SGK3KJ2	0:36	KENTWA01	KENTWA01	NTF	85662	0002	Y	Y	QWEST FOUND BAD UDC FIELD UNITS
WA	UBL 2W ANL	27-Sep-02	24-Sep-02	7:24	WS536956	SGK3KH9	0:33	KENTWA01	KENTWA01	NTF	85662	0002	Y	Y	QWEST FOUND BAD UDC FIELD UNITS
WA	UBL 2W ANL	24-Sep-02	23-Sep-02	15:10	WS536629	SJM3KF5	0:27	TACMWAJU	TACMWAJU	NTF	86596		N		
UT	UBL 2W ANL	25-Sep-02	23-Sep-02	15:28	SC447789	STM4QU3	0:11	SLKCUTSO	SLKCUTSO	NTF	86545		N		
UT	UBL 2W ANL	26-Sep-02	25-Sep-02	20:28	SC451147	SWK4XS3	0:14	OGDNUTMA	OGDNUTMA	NTF	87073		N		
OR	UBL 2W ANL	25-Sep-02	23-Sep-02	20:33	WS536798	SLG3LY3	0:37	ORCYOR18	ORCYOR18	NTF	86635		N		
UT	UBL 2W ANL	23-Sep-02	21-Sep-02	14:29	SC445755	SSD4UT3	0:29	MDVAUTMA	MDVAUTMA	NTF	86367		N		
MN	UBL 2W ANL	26-Sep-02	26-Sep-02	12:35	DE434694	SMR3SH4	1:26	EDPRMNEP	EDPRMNEP	NTF	86913		N		
MN	UBL 2W ANL	27-Sep-02	24-Sep-02	23:12	DE431407	SKW3MC5	1:56	NWBTMNCL	NWBTMNCL	NTF	86810		N		
MN	UBL 2W ANL	27-Sep-02	25-Sep-02	15:45	DE433105	SFS3TU3	1:15	HPKNMNH0	HPKNMNH0	NTF	86956		N		
MN	UBL 2W ANL	26-Sep-02	26-Sep-02	9:14	DE433910	SFS3TV6	0:05	HPKNMNH0	HPKNMNH0	NTF	86956		N		
MN	UBL 2W ANL	26-Sep-02	26-Sep-02	9:15	DE433913	SFS3TV4	0:04	HPKNMNH0	HPKNMNH0	NTF	86956		N		
CO	UBL 2W ANL	25-Sep-02	23-Sep-02	14:14	CD569919	SSM4AU5	0:13	DNVRCOEA	DNVRCOEA	NTF	86567		N		
CO	UBL 2W ANL	25-Sep-02	23-Sep-02	14:54	CD569965	SVS4HW4	0:13	AURRCOMA	AURRCOMA	NTF	86470		N		
CO	UBL 2W ANL	25-Sep-02	23-Sep-02	20:20	CD570135	SWM4QA2	0:36	DNVRCOSL	DNVRCOSL	NTF	86505		N		
CO	UBL 2W ANL	25-Sep-02	24-Sep-02	10:11	CD570430	SVS4LB9	0:16	AURRCOMA	AURRCOMA	NTF	86470		N		
AZ	UBL 2W ANL	25-Sep-02	23-Sep-02	6:50	SC446970	STR4TC9	0:27	PHNXAZNE	PHNXAZNE	NTF	85905		N		
AZ	UBL 2W ANL	25-Sep-02	24-Sep-02	14:44	SC449301	SUV4YD4	2:02	MESAAZMA	MESAAZMA	NTF	86796		N		
AZ	UBL 2W ANL	28-Sep-02	27-Sep-02	14:31	SC453798	STV4SV5	0:08	PHNXAZGR	PHNXAZGR	NTF	87399		N		
CO	UBL 2W ANL	23-Sep-02	18-Sep-02	21:47	CD565853	SSW4GM5	2:09	DNVRCOSL	DNVRCOSL	NTF					NO ACCESS CARE TICKET FOUND- QWEST PLS PROVIDE CIRCUIT ID

1000042

CO	UBL 2W ANL	23-Sep-02	21-Sep-02	10:01	CD568154	STM4RE6	0:08	DNVRCOEA	DNVRCOEA	NTF	[REDACTED]					NO ACCESS CARE TICKET FOUND - QWEST PLS PROVIDE CIRCUIT ID
CO	UBL XDSL	28-Sep-02	25-Sep-02	10:36	CD571452	STM4NH4	2:17	DNVRCOEA	DNVRCOEA		[REDACTED]					NO ACCESS CARE TICKET FOUND - QWEST